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ABSTRACT

Results of a national study of the use of funds provided by the 1974 amendments to Title VII of the Elementary and Secondary Education Act by the state education agencies (SEAs) are presented. The study was undertaken to (1) describe and analyze SEA policies and activities regarding bilingual education, (2) describe and analyze the SEA-level management structure for the coordination of technical assistance, and (3) provide information on technical management and assistance activities the Department of Education may use to help SEA grantees assist local schools in building their capacity to provide bilingual education services to language minority students. The study involved a literature review, analysis of Title VII grant applications submitted by SEAs, and case studies of the implementation of Title VII grants in nine states. This volume presents the nine state case studies for Arizona, Connecticut, Florida, Kansas, Louisiana, New York, Virginia, Washington, and Wisconsin. An introductory section also compares the nine states' funding and key legislative requirements with regard to bilingual education. (MSE)

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DESCRIPTIVE ANALYSIS OF TITLE VII-FUNDED STATE EDUCATION AGENCY ACTIVITIES

VOLUME II: NINE CASE STUDIES

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A STUDY OF TITLE VII-FUNDED SEA ACTIVITIES
VOLUME II: NINE CASE STUDIES

Objectives of the Study

The Office of Bilingual Education and Minority Language Affairs (OBEMLA) contracted with SRA Technologies and Policy Studies Associates, as subcontractors, to conduct a study of State Educational Agency (SEA) practices in the field of bilingual education. The objectives of the study, as they appeared in the OBEMLA Statement of Work, were as follows:

(a) To describe and analyze SEA policies and activities regarding bilingual education, including a synthesis of the most salient provisions of current state legislation and its relation to federal legislation that addresses language minority limited-English-proficient students (ESEA, Title VII, Title I, etc.)

(b) To describe and analyze the SEA-level management structure which has been implemented as a result of Title VII grants to the SEA, including the SEA's personnel, technical assistance knowledge base, methods of delivering technical assistance, budgetary expenditures (e.g., use of federal and other funds) and information dissemination structures.

(c) To provide information on technical management and assistance activities which the Department may use in order to help SEA grantees to assist local schools to build their capacity to provide bilingual education services to LM/LEP students.

The goal of this descriptive study was to compile a list of SEA activities related to bilingual education program implementation and to identify any patterns that may exist as a function of state legislation, amount of SEA funding, concentration of language-minority/limited-English-proficient students, geographical region, or other state characteristics. It was not the goal of the study to identify "promising practices," nor was this an evaluation study.

Description of the Study

Literature review. Literature search efforts included reviewing existing bibliographies on bilingual education, conducting searches of computerized libraries and abstracting services, and examining the contents of bilingual education texts and journals. Materials reviewed included all State Education Agency Title VII Grant Applications for 1983-84. For SEAs in their second or third year of funding under one grant, their 1981-82 and 1982-83 applications were reviewed. The findings were reported in detail in an earlier report submitted to OBEMLA, An Analysis of SEA Title VII Grant Applications and Related Documents, February 15, 1984. Highlights of that report are reported in Volume I of this study.

Also reviewed were files from a 1982 Monitoring Instrument for Review of State Education Agency Projects, conducted by the Office of Bilingual Education and Minority Language Affairs. Most of the information provided by SEAs in this survey was also found in their Title VII grant applications. Evaluation reports of several SEAs were reviewed, as well as materials collected during the nine case study site visits.

SEA Grant Application review. The principal document reviewed for this exercise was each SEA's application for State Education Agency Projects for coordinating technical assistance grants. Forty-two SEAs were successful in obtaining funds in the 1983-84 funding cycle. These are identified and results of the application analysis are reported in Volume I of this report.

While grant applications are suitable for their intended purpose (i.e., determining grant award worthiness and describing their need as well as the proposed program), they are not an ideal document for describing all that an SEA does in the field of bilingual education. The reader is cautioned not to infer that an SEA may not incorporate a given activity in their program if it fails to appear in this report.

The correct message is that an SEA did not report engaging in a certain activity in the documents reviewed.

Nine State Education Agency case studies. In fiscal year 1983-84, 42 state education agencies (SEAs) received a total of $3,820,915 in grants under the Title VII SEA Projects for Coordinating Technical Assistance program. As outlined in P.L. 95-561, SEAs qualify for up to 5% of the aggregate amount granted under Title VII to LEAs in the preceding year. Currently, amounts to individual SEAs range from $861,314 (New York) to $3,000 (Georgia).

Table 1 identifies the nine states whose case studies are reported in this volume, and presents the amounts of the Title VII grants awarded to each for coordinating technical assistance during the 1983-84 school year.

Table 1

States Receiving Title VII SEA Grants
for Coordinating Technical Assistance

State	Amount of SEA Grant*
Arizona	$124,241
Connecticut	53,262
Florida	102,110
Kansas	4,174
Louisiana	68,028
New York	861,314
Virginia	4,724
Washington	59,850
Wisconsin	22,639

*Amount awarded for use in 1983-84 school year.

For comparison purposes, in Table 2, the figures from Table 1 have been converted into percentages, indicating each state's share of (a) total Title VII SEA funds for coordinating technical assistance. The size of individual SEA grants is roughly proportional to the size of the states' enrollment of LEP students, although states with larger percentages of LEP students tend to receive somewhat smaller-than-proportional grants. For a comparison of the nine states reported here with all 42 states funded by Title VII, see Table 2, in Volume I of this study.

Table 2

States' Proportionate Shares of Title VII SEA Funds for Coordinating Technical Assistance and LEP Enrollment

State	Proportion of Title VII SEA Funds*
Arizona	3.3
Connecticut	1.4
Florida	2.7
Kansas	0.1
Louisiana	1.8
New York	22.5
Virginia	0.1
Washington	1.6
Wisconsin	0.6

*Indicates each state's percentage of total Title VII funds for SEA coordination of technical assistance. No state exceeds the 5% of Title VII funds to LEAs limit specified by law.

Table 3 summarizes the nine states' legislative requirements as they pertain to the provision of special education for the limited-English-proficient student. For additional information, see the subheading, "Legislation" under each case study that follows.

Table 3
Key Features of State Bilingual Education Legislation

	Arizona	Connecticut	Florida	Kansas	Louisiana	New York	Virginia	Washington	Wisconsin
Type of Legislation	M[1]	M	—	P[2]	—	M	—	M	M
Language Maintenance Program	X								
Transitional Program	X	X		X		X		X	X
ESL Program	x	x						x	
Provision of LEP Status	X	X				X		X	X
Entry Tests	X	X				X		X	
Exit Tests	X	X				X		X	
Yearly Evaluation of Students	X	X				X		X	X
Participation of Monolingual English Speakers	X								X
Prohibition of Segregation of Students	X	X							X
Cultural Component									
Outline of Methodology									X
Teacher Certification for Bilingual Education	X		X	X[3]		X		X	X
Teacher Certification for ESL			X	X[3]	X	X	X		X
Staff Development-Financial Assistance	X								
Bilingual Teacher Aides-Career Ladder Program									
Parent/Community Involvement	X								
Use of Community Coordinators	X								
Parental Consent for Student Enrollment	X	X							X
Availability of State Funds				X		X		X	X

[1]Mandatory legislation
[2]Permissive legislation
[3]Legislation under development

The Office of Bilingual Education and Minority Language Affairs selected the nine State Education Agencies (SEAs) that were to be studied. The nine SEAs, as a whole, encompassed the following characteristics:

- high, medium, and low level of Title VII funding;
- high, medium, and low numbers of LEP student populations;
- states with mandatory, permissive, or no bilingual education legislation;
- LEA bilingual programs for a variety of ethnic groups (e.g., Puerto Ricans, Cubans, Mexican Americans, French, Greeks, Vietnamese, Native Americans, Laotians, Cambodians); and
- inclusion of various geographical areas of the United States.

States were asked to participate voluntarily in the study. None declined to participate and other states expressed a desire to be included. Due to funding and scheduling restrictions no additional SEAs could be accommodated.

Since the study design did not allow use of questionnaires, an interview outline was developed and used to guarantee consistency and reliability of information. All field researchers participated in a two-day workshop designed to standardize the approach and comprehensiveness of the field work.

The bilingual office of each of the nine SEAs was visited by a two-member team of researchers. Interviews were conducted with the State Superintendent or Associate Superintendent, the director (or supervisor, chief, administrator) of the state bilingual education office and his/her entire professional staff. The director's immediate supervisor and the heads of cooperating departments (e.g., evaluation, migrant, refugee) were interviewed also.

Two local education agencies (LEAs) in each state were visited, where possible, to solicit from the LEA bilingual education program director information regarding the processes followed to solicit technical assistance. Two states visited (Virginia and Kansas) have only one Title VII LEA program each. These two programs were visited. Where travel restrictions prohibited the visitations of LEA projects, interviews were conducted by telephone.

Each SEA was afforded the opportunity to comment on its respective SEA report, and comments from SEA personnel have been incorporated in this report. The information collected and reported in the case studies is comprehensive. However, the reader is cautioned against generalizing to other SEAs. By design, the SEAs selected for this study were to represent a variety of characteristics, and the sample is too small to allow generalizations to be made.

ARIZONA STATE DEPARTMENT OF EDUCATION,
BILINGUAL EDUCATION AGENCY

ARIZONA STATE DEPARTMENT OF EDUCATION,
BILINGUAL EDUCATION AGENCY

I. Background

Number of LEP students. In 1982-83 students with a primary or home language other than English in Arizona's public schools (K-12) reportedly numbered 84,698 (Bilingual Instruction and Special English Training, Annual Report, 1982-83). This count does not include students from the Bureau of Indian Affairs or parochial schools. Data on the number of limited-English-proficient (LEP) students are not collected by the state, but, according to a 1983 study by the State Bilingual Unit Director, an estimate of about 30,000 LEP students was derived using the 1980 census and student language background and achievement data. This LEP population is comprised primarily of Hispanics and Native Americans. Hispanics are concentrated primarily in the seven counties of southern Arizona, and Native Americans are concentrated in the three northern counties of the state. However, minority populations can be found in all 14 counties.

Title VII service centers. Arizona does not have a Bilingual Education Multifunctional Support Center (BEMSC) for Spanish/English bilingual education. The Title VII National Indian Bilingual Center at Arizona State University serves the state. Services to the Bilingual Education Office are also provided through the Bilingual Education Service Center (BESC) at San Diego State University. This BESC is currently funded through August 30, 1984.

Legislation. Arizona's bilingual education legislation was enacted in 1969 and amended in 1974. The legislation is permissive in nature and allows for transitional bilingual education programs and English as a second language (ESL) programs. It specifies requirements for student identification, program participation, and criteria for exiting from the program. Teacher certification requirements are also stipulated, such

as proficiency in the target language and courses in culture and methodology.

In January, 1984, Senate Bill 1160 with a reference title, "Bilingual Instruction," was introduced to the legislature and signed into law on April 18, 1984. This bill repealed ARS 15-705-707 and amended Title 15, Chapter 7 by adding Article 8—Bilingual Programs and English as a Second Language Programs. The new law brings state law into conformity with federal requirements for serving LEP students. The legislation states that programs of bilingual instruction or English as a second language must be provided in any school district in which there are LEP students. The statute prescribes four program options; steps to identify and assess properly the language needs of LEP students; criteria and procedures for determining when a student is no longer a LEP; and other requirements absent from the previous legislation. In addition, the bill also calls for all teachers teaching LEP students in a bilingual setting to acquire the bilingual approved area (BET) on their basic or standard teacher certificate by the year 1987-88.

II. Resources of SEA Bilingual Education Office

Funding. The Bilingual Education Office receives funding through Title IV, Title VII, refugee funds, and state funds. In anticipation of a reduced Title VII allotment for 1983-84, the Bilingual Education Office applied for and received Title IV funds under the Civil Rights Act. Thus, for the first time, the SEA Bilingual Office is operating with $110,000 from Title IV.

The Bilingual Education Office received $124,000 from Title VII for the 1983-84 year. For 1981-82, it received $168,071, and for 1982-83, it received $195,720. Title VII 1983-84 funding was based on 5% of the 1983-84 Basic and Demonstration programs.

The Bilingual Education Office also received $60,000 in state funds and $1,000 (which is 1% of the $100,000) in refugee funds. The total funds for all operations of the office are $295,000. These amounts are shown in Table 4.

Table 4

Bilingual Education Office Funding Sources for 1983-84

Funding Sources	Amount
Title IV	$ 110,000
Title VII	124,000
State Funds	60,000
Refugee Funds	1,000
Total:	295,000

Spending constraints. The Bilingual Education Office is experiencing spending constraints in the form of a hiring freeze and restrictions on out-of-state traveling. A clerical assistant position funded under Title VII remains to be filled. Due to inflation and funding cuts, total Arizona SEA staff has decreased from 400 employees to 300 in the last two years. This represents a 25% loss in staff. In order to do out-of-state traveling, the staff must give 12 working days notice. Otherwise, they must petition the governor.

Staffing. The Bilingual Office staff comprises a total FTE of 6.2. This consists of the program director, three program specialists, one administrative assistant, one secretary, and a clerical assistant (vacant position). The source of funding for each position is presented in Table 5.

Table 5

Bilingual Office Staff Source of Funding

Position	Title IV	Title VII	State Funds
Director	25%	75%	
Program Specialist	50%	50%	
Program Specialist		25%	
Program Specialist			100%
Administrative Assistant	50%	50%	
Secretary		100%	
Clerical Assistant		100%	

The State Bilingual Unit staff has the appropriate degrees, experience, and proficiency in the non-English languages specified in the job descriptions. The director, the two Hispanic program specialists, and the administrative assistant have worked together in their present positions for the last eight years. Prior to her present appointment, the director served as program specialist for a year. One of the program specialists had seven years previous experience with the SEA before joining the staff. The State Bilingual Unit staff had 2 to 10 years of experience in local programs and about two years experience as directors of training programs. Members of the staff are currently engaged in postgraduate studies at Arizona State University at Tempe.

The quarter-time Native American program specialist funded under Title VII has been with the State Bilingual Unit for two years. Her main functions, as reported, are to provide technical assistance and to review Native American Title VII projects. Given the distance between project locations and the number of tribal Indian education projects (n = 12) that need to be reviewed throughout the state and the varied nature of the technical assistance needed, there appears to be a need for an additional staff person to work with the Native American bilingual projects.

Activities to build bilingual education staff capacity include attendance in training courses at the university and workshops in various areas such as computer use, professional reading, and training of other SEA staff. The SEA staff come from departments such as Migrant Education, Special Education, Chapter 1, Indian Education, and the Audit Department. They are provided in-service training on Title VII Bilingual Education programs, and on the uses of resource documents such as the annual report and the census report. The training of staff from other SEA departments facilitates communication and cooperation between the State Bilingual Unit staff and other SEA staff.

The State Bilingual Office is one of three units which fall under the direct supervision of the Deputy Associate Superintendent for Basic Education. The Deputy Associate Superintendent reports to the Associate Superintendent for General Education, who is responsible to the Deputy Superintendent. The Deputy Superintendent reports directly to the State Superintendent.

III. Technical Assistance and Information Dissemination

Local needs. The State Bilingual Unit assesses the needs of local districts through a formal needs assessment survey and through a number of less formal means. The survey form is sent to districts once a year, and results are used to help determine training priorities for the state in two general categories: training needs and management needs. Information obtained from visits to districts, telephone discussions, meetings, and other sources are also used. The SEA views its role as providing leadership in bilingual education as well as responding to special needs of local districts. To that end, plans are made that incorporate future needs. Needs are also determined by legal requirements. For example, the state has mandated achievement testing in English. Students who are LEP may be exempted from the testing, but they must be given instruction in the native language and assessed in that language. This amendment has created a need for technical

assistance regarding tests and curricula in languages other than English.

The SEA also views its role as interpreting federal and state regulations and laws, helping districts acquire funds, and providing guidance in student placement.

What are the specific needs? The needs of local districts are diverse for several reasons. First, the degree of sophistication among districts varies widely, from the large experienced urban districts with several well-established programs serving a large population to the small districts with a new influx of LEP students and no experienced or qualified staff. Secondly, Arizona's language and cultural groups are diverse. Of the 24 Title VII programs funded in 1983-84, 12 serve a Spanish-speaking population, and 12 serve Native-American populations including Navajo, Papago, Apache, Yaqui, Pima, Havasupai, and Hualapai. Needs of the Indian program vary. Some Indian languages have official orthography (e.g., Navajo, Papago, Hualapai) while others do not (e.g., Yaqui, for example). A few tribes (e.g., Apache) have expressed reservations about the use of their language in school. Feelings toward implementing a language proficiency assessment process have been mixed.

The SEA expressed the view that the SEA role should be to serve previous, current, and potential Title VII grantees as well as unfunded districts. The amount of funding the state receives is reduced depending on the extent to which a district receiving Title VII funding is successful in institutionalizing a program and the extent to which the SEA contributes to that success by providing technical assistance focusing on capacity building. Thus, the SEA director feels that the continuing needs of such districts are not recognized by OBEMLA under the present system of allocating Title VII funds to SEAs.

Needs for Which SEA May Coordinate Assistance

Sources of assistance. The SEA is served by the Evaluation and Dissemination Assistance Center (EDAC) in Los Angeles, the Bilingual Education Service Center (BESC) in San Diego, the National Origin Desegregation Assistance Center (NODAC) in Albuquerque, and the Multifunctional Center (NIBMFC) for Indian programs in Tempe, Arizona. The organization with which the State Bilingual Unit works most closely is the BESC. There is a local representative of the BESC in a satellite office in Phoenix and one in Tucson. The major roles of the BESC in assisting the SEA are to sponsor or co-sponsor workshops and to assist individual districts with proposal writing after an SEA-sponsored initial workshop. The SEA does not serve as a formal broker between districts and the BESC; rather districts request services directly. The BESC is viewed as very helpful, although some service time was lost in late 1983 due to federal funding timelines and due also to the proposed switch from a BESC to a multifunctional center.

The EDAC in Los Angeles has provided some services to the SEA in evaluation matters. The newly funded National Indian Bilingual Center (NIBC) in Tempe, Arizona will serve Arizona through two of its four offices, one in Tempe and one in Albuquerque. Tribes and languages served will include: Havasupai, Hualapai, Papago, Pima, White Mountain Apache (Western Apache), Yaqui, and Navajo. The Center has a 12-month contract to provide technical assistance and proposes a service delivery plan involving coordination with SEAs, other BEMSCs, Title IV centers, and other organizations. Although planning meetings had occurred between the SEA and the NIBC at the time of the site visit, the center had only begun to provide services. For example, several workshops on Indian issues were presented at the state bilingual education conference.

The Cultural Awareness Bilingual Assistance Center (CABAC) in Albuquerque is a NODAC funded under Title IV. The Center provided three

training workshops to the SEA in the 1983-84 school year. High Intensity Language Training (HILT) was provided by the CABAC in Spanish and Navajo. In addition, the Center directors attend monthly meetings of the Central Arizona Bilingual Consortium.

The state has three major universities, Northern Arizona University in Flagstaff, Arizona State University (ASU) in Tempe, near Phoenix in the central part of the state, and the University of Arizona in Tucson in the southern part of the state. Professors from the universities have worked with the SEA personnel to upgrade the bilingual education teacher certification requirements, to articulate their courses to these requirements, and to develop procedures for assessing teachers' language proficiency. In addition, the IHE's provide the SEA with lists of courses offered, which the SEA disseminates if funds permit. SEA personnel have worked most closely with ASU, the university located in the Phoenix area. ASU has a bilingual education faculty who have been called upon by the SEA to offer workshops and offer courses in local school districts, and to write a paper on state policy.

Within the SEA, the Bilingual Unit works most closely with Chapter 1 and Indian Education since these groups meet weekly with a supervisor held in common. There is relatively little coordination with Migrant Education and Foreign Language Education relative to other states. A great deal of emphasis has been placed on working closely with Special Education and Chapter 1 to exchange information. Other units within the SEA are supplied with information on bilingual education regulations, census data, and bilingual and ESL program characteristics for use in monitoring their own programs. Training has been provided to other SEA personnel and their way paid to conferences. Cooperation is strong between the State Bilingual Unit and the State Testing Unit. The Testing Unit has helped districts see the need to assess language proficiency to determine whether students are LEP and eligible for exemption from state mandated achievement testing. The Bilingual Unit in turn reviews exemption requests and is currently

working with Vocational Education to plan bilingual vocational training programs.

Technical assistance. The State Bilingual Unit offers technical assistance through workshops, site visits, courses, meetings, telephone calls, published documents, and an annual state conference. Workshops are generally co-sponsored with other organizations including the BESC, the universities, or CABAC. Topics emphasized in the current year have been: L2 literacy, L2 acquisition, and program implementation. Between 130 and 200 people participated. These workshops were funded by Title IV. During 1982-83, a well-planned series of five workshops in language proficiency assessment was offered; the proceedings will be published to help districts in analyzing and selecting instruments. Yearly workshop topics include EDGAR, proposal writing, regulations, budgets, parent training, and capacity building.

SEA staff visit about half of the Title VII districts each year. Each Title VII project is visited for one day in its first year to provide any needed assistance. A simple review form is used. In the second year of funding, however, Title VII projects receive a two-day visit by a team of three or four persons, including a BESC representative. An extensive Program Quality Review Instrument (PQRI), based on the California model, is completed. A feedback interview is conducted at the end of the visit, and a comprehensive written report is later sent to the site and passed on to OBEMLA. The visits are viewed as a "review" rather than "monitoring" so that districts will be more receptive. A total of 13 districts were visited in 1982-83, and 12 were visited in 1983-84. Non-Title VII projects are visited upon request.

Answering questions by telephone is a major means of assisting personnel in the field. Program directors in two school districts indicated that the SEA was extremely helpful to them and responsive to requests for advice or information. Through their contact with districts, the State Bilingual Unit has recognized the need for certain

courses and has worked with ASU to develop them. The university has been flexible in responding to the need. For example, at the SEA's request, ASU designed an evaluation course in which each participant designed and carried out a study to address local data needs. The response was enthusiastic. The Director of the State Bilingual Unit has also provided training to SEA personnel in another state on the role of the SEA in bilingual education.

The State Bilingual Unit has assisted the newly formed group entitled Arizona Action Organization for Bilingual Education (AAOBE). It is composed of community liaison workers who meet once a month for information exchange and to receive assistance on curricula, budgets, community work, and other topics from SEA and BESC personnel.

Within the SEA the Bilingual Unit has worked to get bilingual textbook series on the state's recommended textbook list. They were also involved in producing Spanish and Navajo versions of the state's basic skills kit and are currently working toward the same goal for Vocational Education.

Dissemination of information. The SEA works with three consortia in the state: the Central Arizona Bilingual Consortium (CABC) for the Phoenix area, and northern and southern groups. The Central group is the largest and most active of the three. The CABC is composed primarily of SEA and BESC personnel, and university, community college, and district directors from the Phoenix area. Its monthly meetings provide an important forum for the exchange of information on topics such as current legislation and programs. The group has several committees, one of which helped draft the new proposed state law.

The Consortium serves as the principal formal means of dissemination for the central part of the state. Information is also disseminated through mailings regarding specific issues, a newsletter published three times a year, and through groups such as the Arizona

Association for Bilingual Education (AABE) and the Tucson Association for Bilingual Education (TABE). The yearly AABE conference serves as a means of disseminating information through workshops. The SEA staff members also accept some speaking engagements upon request. The staff stated that there is a need for funds for more frequent and thorough dissemination of information.

Several publications have been developed and are available to districts: (a) Strategies for Addressing the Needs of Limited-English-Proficient Students, 1983, a 70-page document on program implementaton; (b) Language Proficiency Assessment: Concepts, Purposes Application, in press, (c) American Indian Language Proficiency Assessment: Considerations and Resources, 1983, (d) ESEA Title VII Bilingual Education Project Profiles, 1982, (e) Bilingual Instruction and Special English Training: Annual Report 1982-83, and (f) ESEA Title VII Bilingual Education Primary Language Census Report, 1983. In addition, several videotapes of major speakers and several films are available on loan to districts.

IV. Other SEA Functions

Annual report. The SEA surveys 210 school districts each year to gather data for a report required by law. Each district offering a "Bilingual or Special English Program" supplies information concerning home language survey methods, language proficiency assessment methods, curriculum, numbers of students, staff characteristics, and funds spent.

Student identification. All districts are required to report annually the number of students with a primary/home language other than English. While a specific method of gathering the information is not required, the two most common sources of data are (a) information from parents recorded on student's enrollment form, and (b) teacher identification. A home language survey is conducted by some districts. The information is included in an Annual Report and reported to the

legislature each year. As part of the state achievement testing program districts are required to report the number of LEP children taking the exams. Due to Senate Bill 1160, there will be new state requirements for language proficiency testing to determine LEP status, however. As mentioned previously, SEA personnel are encouraging systematic language assessment for students from a non-English-language background. In addition, assessment methods or instruments (if any) used by each district are listed in the Annual Report. The State Bilingual Unit is also required to conduct a census of students eligible for refugee services and to process district applications.

Teacher training. Although a 15-hour Bilingual Education Teacher (BET) "approval area" is offered in Arizona, school districts are not required at the present time to hire teachers with the specialization to serve LEP students in bilingual or ESL only programs. Only 14% of the program instructional staff have obtained the BET specialization. By the 1987-88 school year, all bilingual teachers will have to hold the BET, due to the new legislation (Senate Bill 1160). The SEA is involved in strengthening the specialization and promoting requirements for teachers with the specialization. Data on the qualifications of teachers and aides in state bilingual and ESL programs are gathered and included in the Annual Report.

Monitoring. The SEA views its purpose in visiting Title VII programs as conducting a program review to determine technical assistance needs and to help OBEMLA determine if a program is operating within legislative requirements. As described above, all Title VII-funded projects are visited for one day in their first year and for two days in their second year. Most districts view the visits as helpful; however, if a district's practices are not in line with Title VII regulations, OBEMLA is notified.

Review of Title VII applications. The SEA reviews all Title VII applications before they are submitted to ED. However, they no longer

send state comments to OBEMLA because, according to the SEA staff, the comments are not used. Comments are supplied to the applicant.

National SEA organization. The SEA Bilingual Unit Director participates in a national organization of SEA bilingual program directors, begun in 1977. The group discusses how SEA technical services might be better coordinated and what assistance is needed from OBEMLA. Several letters containing recommendations have been produced.

Some of the proposed recommendations include alternatives to current Title VII funding which would provide greater equity in the distributions of funds to LEAs with LEP students. Another recommendation is for the clarification of issues such as the state vs. federal role in reviewing, monitoring, and auditing LEAs. Specific recommendations to improve SEA applications include accurate identification of LEP students, a clear listing of the state's needs and priorities based on statewide needs assessments, and consistency among state and federal requirements.

V. Perceived Results

Most and least effective activities. According to SEA staff, the State Bilingual Unit in the Arizona SEA has been effective in providing technical assistance and services to state and federal bilingual programs. The visits to districts involving the use of the PQRI have produced visible improvements in program practices. Approximately three districts a year request a PQRI review. The new format for providing evaluation training was viewed as highly successful.

The staff feel they have made major strides within the SEA as well. Coordination with Special Education has improved, a staff member has gained access to the textbook committee, and stronger certification requirements and legislation have been introduced. Two school districts that use the state's services were highly complimentary.

Another of the activities which the SEA considers most effective is training workshops. The Bilingual Education Office receives informal evaluation on Title VII workshops to LEAs through letters from the districts and the Central Arizona Consortium. They are aware that districts would like to see these workshops continued. For example, popular workshops include EDGAR, Title VII regulations, budget training related to the state, and PQRI. The Bilingual Education Office also receives evaluation results of the BESC workshops which are multifaceted.

One of the activities that the State Bilingual Unit conducts but which is not extensively used by school districts is census data gathering. The staff acknowledges that census data have highlighted the language-minority student population since 1977. However, they are concerned with the limited extent to which this information helps a district solve a particular problem. Internally, the unit has used the information for various reports, proposal writing, in-service training, and to afford institutions of higher education information to provide teacher training.

VI. Priorities, Trends, and Needs

The State Bilingual Unit Director felt that the small amount of state funding provided to her office and the threat of more reductions in funds was a major constraint in carrying out the responsibilities of her office. She has turned to Title IV to provide staff salaries and has sought an additional position funded by Title IV. She has been short one secretary because of a hiring freeze. The amount of paperwork required to administer the refugee program, for example, is felt to be great in proportion to the funds received.

The Bilingual Director plans to reorient the major focus of the office away from a leadership role toward a technical assistance role. Due to the great variation in the needs of districts, she feels that

time would be best spent assisting individual districts to implement quality programs and build capacity. One specific plan for moving in this direction involves technical assistance in evaluation. The SEA will carefully review each district's 1984-85 evaluation plan and will attempt to develop a model evaluation design. The SEA will then assist individual districts in writing their own evaluation plans for the following year.

There is a great need for more trained bilingual teachers in the state since the number of LEP students is projected to increase. The SEA feels that the universities need to take a stronger role in producing qualified teachers to meet the need.

The Arizona SEA staff feel that there are several steps that could be taken by OBEMLA to improve the state's ability to provide adequate technical assistance and services to bilingual programs. First, the SEA's clients should be defined as prior, current, and future (or potential) grantees. Under the present system of allocating funds, as the number of institutionalized programs increases, the funds received by the state are decreased. The staff felt that the size and diversity of the broad client base should be a consideration in funding as well as the number of LEP students in the state. In addition, one staff member suggested the use of a standard formula with a bonus for good performance as evidenced by the final report. It was felt that there should be more communication from OBEMLA and an occasional visit by the OBEMLA project officer to the SEA.

CONNECTICUT SEA BILINGUAL EDUCATION OFFICE

I. Background

Number of LEP students. According to the most recent SEA figures, collected in 1983, there are a total of 9,768 LEP students in state-mandated bilingual programs. However, a proposal submitted in 1981 estimated that there were 4,600 LEP students not served by bilingual programs. Each district assesses the language dominance and proficiency of its own students according to state-mandated procedures. District figures are turned in annually to the state.

Title VII grants in the state. In 1983-84, Connecticut received $1.1 million in Title VII grants other than the SEA grant. These grants represented 10 separate programs implemented in eight districts. This amount supplements the state's funding for bilingual education which was $1,805,000 in 1983-84.

Title VII service centers. The BEMSC which serves Connecticut is located in Rhode Island, about an hour from the SEA. The same organization with the same director was previously the BESC grantee.

State legislation. Connecticut has had state legislation mandating bilingual education programs since 1977. Each district is required to conduct annual assessments of students' language dominance and proficiency according to state-mandated procedures. Students who are dominant in a language other than English are given an English proficiency test that assesses listening, speaking, reading, and writing skills. Students that are judged not capable of participating meaningfully in an all-English classroom qualify for a bilingual program. If there are 20 LEP students in one school with the same home language, then a bilingual program is mandatory.

The language proficiency of students participating in bilingual programs is reviewed annually. Students must exit from the program if they meet two out of three criteria. These criteria are: (a) on an English language proficiency test, a score at or above the 50th percentile, (b) average or better grades in classes taught in English, and (c) an interview to determine whether students are capable of benefitting from all-English instruction. Parents must be informed before their children are placed in a bilingual program or if they are removed from a program. Parents and community members are required to participate in the planning of the LEA's proposal for state funds. These funds are disbursed based on the total state appropriation and the number of LEP students per district. A yearly evaluation is required from all state bilingual projects.

II. Resources of SEA Bilingual Education Office

Funding. The bilingual Title VII grant has remained fairly stable. The grant for 1983-84 was $53,262. In 1982, it was $58,102; in 1981, it was $53,427. The state adds about $25,000 toward the director's salary. Through sharing of resources, the bilingual director has access to additional support services.

Spending constraints. Although the bulk of the state bilingual education director's working budget is federal, it is still subject to state constraints. These include periodic freezes on travel and a 45-day approval period for all contracts.

Staffing. The state bilingual director is the only full-time professional staff member. She is bilingual, has worked as a trainer in the field, and is completing a doctoral program. The state director position, which she has occupied for five years, is her first position within the SEA. The position was originally funded by Title VII but is now partially supported with state funds. While this represents some capacity building, SEA administrators expressed doubt that a greater

degree of support would be possible. Forty percent of the time of an evaluator employed by the SEA is also allocated to the bilingual office but is not paid by Title VII. The evaluator works directly with the LEAs in conducting the statewide evaluation. In addition, 50% of a secretary's time is paid with Title VII funds.

III. Technical Assistance and Information Dissemination

Local needs. SRA staff visited two LEAs in Connecticut whose bilingual education programs predate the state law: Hartford, a large urban school district, and Windham, a small rural district with a growing Hispanic minority. The priority for technical assistance in each case was assistance in preparing the Title VII proposal. The SEA staff was seen by both LEAs as being particularly useful in considering the local needs and federal funding priorities to develop an acceptable proposal. The SEA bilingual education director also stated that one of her most important functions is assisting districts in grant applications and in serving as a link between LEAs and ED. She described her role as advocate, mediator, and occasional arbitrator between the LEAs and ED. In addition, she saw herself as a gatekeeper insuring that the programs developed in the state are of high quality and are suitable to local needs.

There were some differences in need expressed by the two LEAs. The director at Windham, the smaller LEA, wanted more help of the "nuts and bolts" variety in areas such as staff development, curriculum, and test selection. The Hartford director, working in a district with more bilingual resources, was interested in questions of policy, information on procedures, and updates on research and legislation. Since Connecticut is a small state, the SEA director is well aware of the needs of the 13 districts with bilingual programs. She is frequently on the telephone with the program directors, has visited each program, and holds regular meetings for Title VII directors. LEA directors say that they are always able to get a response when they ask for assistance.

Technical assistance. The SEA is taking the initiative in providing technical assistance in instructional quality and improvement in data gathering. The SEA director functions as the coordinator and monitor of training. Funds from the SEA budget are occasionally used to pay for trainers even though the sponsor may be a professional association or the BEMSC. A particular concern of the SEA director is that staff training be specific enough to be useful. For example, a general workshop on teaching Spanish reading is not appropriate for both new and experienced teachers. The SEA has begun a new statewide evaluation plan which will result in improved data gathering. Although the impetus to collect data comes from the state bilingual program, all Title VII sites are included. The SEA has developed data collection procedures and forms with extensive feedback from LEAs. SEA consultants are available to the LEAs to help implement the data collection effort.

The SEA is responsive to any request for assistance, according to LEA personnel. However, activities such as project management, assessment of curriculum materials, budget and funding strategies for the time when Title VII grants end, and selection of language proficiency tests—all specifically mentioned in the regulations—are not areas of current priority. There are a number of historical reasons for this. Project managers once met on a monthly basis with the SEA director but after several meetings felt this was no longer necessary. They are either already experienced or getting management assistance locally. The SEA director helps LEAs re-apply for different Title VII grants and has assisted in finding alternative funding sources such as Chapter 1, corporate, or Chapter 2. State bilingual funds are allocated strictly on the basis of LEP population count, derived through language proficiency testing. The characteristics of acceptable language proficiency tests have been identified by state law and are selected by the LEAs.

A new area of technical assistance taken on by the SEA is program evaluation. A detailed statewide plan has been developed in cooperation with the LEAs. The SEA has provided "model" data collection forms and

is providing extensive consulting for the first year. The evaluation plan involves classifying the students into four groups according to their program status. The results of the evaluation will provide useful data on the success of bilingual education and on the length of student participation in bilingual programs. The SEA also gives extensive individual assistance to LEAs in obtaining Title VII funds and completing the necessary paperwork for both state and federal programs.

Sources of assistance. The SEA bilingual director makes use of a variety of assistance sources, but stated that the whole system should be re-examined to avoid duplication and insure cost effectiveness. She makes frequent use of NCBE for statistical information and finds it efficient and very useful.

The director feels that there are problems resulting from the reorganization of the Title VII support system. For example, the BEMSCs are supposed to do evaluation consulting, but this may result in duplication of service since the EDAC performs this function well. There is also evidence of some overlap in management training in that two workshops were conducted in close proximity by OBEMLA and the EDAC. Meanwhile, it is understood that the BEMSC also has responsibility in this area. The SEA bilingual director misses the materials development centers which have been eliminated; it is difficult for LEAs to develop their own materials for programs in languages like Korean and Polish. She feels that some national effort should be made to address this issue, particularly since these languages with small numbers are found in different parts of the country.

The state bilingual director stated that the BEMSC works well through a local consortium system. University staff are part of the consortium and provide consulting through the BEMSC to LEAs at no charge. This means LEAs in Connecticut have access to a variety of experts at IHEs in neighboring states.

How SEA provides assistance. Staff at both LEAs visited stated that they were able to get assistance from the SEA bilingual director any time they asked for it. The SEA bilingual director says she is frequently on the telephone with the LEA program directors. The SEA bilingual director visits each bilingual program in her role as monitor. These visits frequently result in suggestions for improving the programs.

The SEA bilingual director encourages LEAs to apply for Title VII funds. She also provides consultation and assistance in grant preparation. According to one LEA, she made several visits to the site for this purpose. All Title VII proposals are reviewed by the SEA bilingual director, who may assist in the negotiations. However, the SEA bilingual director stated that she does not see herself as a monitor or a decision maker for Title VII projects. She sees that as the role of the funding agency, OBEMLA.

The SEA bilingual director offers workshops directly for LEA staff. A recent workshop on the new evaluation plan was attended by representatives of all state bilingual programs, including those under Title VII. Other workshops are by invitation to specific groups. As mentioned earlier in this section, the SEA bilingual director meets regularly with Title VII directors. Three years ago monthly meetings were required, but now meetings are held as needed, two or three times a year. The directors are planning to form their own organization, and the SEA bilingual director sees her role as providing support for the LEAs' agenda.

How SEA coordinates assistance. The SEA bilingual director works with other organizations to provide training for LEA bilingual personnel. For example, she may use her budget to pay for a workshop which will be offered by the BEMSC or by the Connecticut Association for Bilingual Education (CABE). She acts as an intermediary between training agencies and the LEAs. Two major problems associated with the

training are that the LEA staff are not specific enough about their needs and are polite rather than truthful in their workshop evaluations. The SEA director, therefore, works with districts to define the needs as precisely as possible and with the training agencies (e.g., BEMSC, IHE, the SEA) to find the most appropriate resources. The training is further complicated by new regulations which require the BEMSC to describe planned workshops and dates in the proposal and also require the 45 working days lead time by the state for all contracts.

The SEA bilingual director is a key link among the various agencies serving LEP students by virtue of her position and her participation in various groups. She serves on the advisory committees for the EDAC and the BEMSC. She receives advice from a State Advisory Council appointed by the state board comprised of directors, parents, and teachers. She is also a member of the State Task Force which meets every six weeks to coordinate SEA activities for LEP students. Consequently, she is in a position to know the resources and the needs and to provide proper coordination.

Dissemination of information. The SEA bilingual office does not have a newsletter, but the director sends out mailings two or three times a month. Some of these are targeted to specific subgroups such as programs working with Spanish speakers or other language groups. The mailings contain any information deemed relevant and important by the SEA bilingual office, such as summaries of research and legislative updates.

IV. Other SEA Functions

Activities that Title VII authorizes SEA to coordinate. The major focus in 1983-84 was the state coordination of bilingual education evaluation. The SEA requires districts to collect detailed information on program participation, entry/exit, language proficiency, and achievement. Records are kept on samples of students even after they

exit from the bilingual education program. Attendance records are reported with achievement scores so that it will be possible to separate the students who receive the full benefit of the program from those who did not. The SEA director stated that if this evaluation can be carried out over several years, as planned, meaningful and interesting data on students' achievement will be collected. Title VII programs are participating in this evaluation, but the impetus comes from the state board and their concern with the state bilingual program.

In the past, the SEA dedicated a major effort to selection and use of language proficiency instruments. This is no longer a major issue because the programs are well established. The SEA still conducts an annual survey to determine training needs.

Monitoring. A major role of the SEA bilingual director is to monitor the state bilingual programs and LEAs that have LEP students. According to her definition, monitoring means having the power to take the money away, and she has effectively used this leverage. The monitoring responsibility for Title VII projects lies with OBEMLA, but the SEA bilingual director feels that OBEMLA does not have the number of staff to carry out effectively this responsibility.

Bilingual programs are monitored once every three years. Depending on the size of the district, a monitoring visit may take from one to three days. The SEA bilingual director investigates specific areas such as testing, program content and comparability with the regular program, integration of LEP students, materials, distribution of resources, and fiscal controls. A meeting is held at the end of the visit with the principal and superintendent to discuss issues of compliance and to make recommendations. If the LEA is not in compliance, it is given a time limit in which to correct the situation, and the SEA continues to follow up.

Data gathering. The data collected are the language dominance and proficiency census, and the achievement evaluation. They are collected primarily for state purposes. The statewide evaluation plan described in the section on activities will initiate a new type of research project that will provide information in areas such as the optimal length of program participation for different types of students, the effect of interrupted attendance, and the expected performance of LEP students.

In addition, there are research fellowships and round tables in research at the IHE. Many of the fellows are themselves bilingual directors. They use the fellowships to develop projects based on the needs of local projects.

Review of Title VII applications. The SEA director reviews all Title VII applications before they are submitted. She has usually participated in their preparation as well by providing proposal writing workshops and by answering legal and programmatic questions.

Bilingual teacher certification. The present bilingual education legislation has no specific teacher certification requirements other than being bilingual and in possession of a bachelor's degree. Requirements have been proposed for certifying both bilingual and ESL teachers, and the SEA bilingual director advocates these requirements.

V. Perceived Results

Most and least effective SEA activities. Both the SEA bilingual director and the LEA directors who were interviewed rated the assistance in preparing Title VII grants as the most effective activity. The LEAs stated that it was important to have a local person to answer questions of policy and procedure and to serve as an intermediary for them in their dealings with ED. The SEA bilingual director offers ideas to LEAs and is concerned with the quality and appropriateness of the proposed projects.

The SEA bilingual director saw her office as effective in the following areas: as a link between LEAs and ED; as a disseminator of information on funding, research, legislation, and other topics; as a collaborator with professional organizations to meet more effectively the training and information needs of bilingual staff; and as a representative of the interests of LEP students within the SEA.

She felt her office was least effective in its relationship to the parents of LEP students. Parent participation is required for all state programs, but the SEA bilingual director stated that she felt parent participation was used like a rubber stamp and that much effort and work was needed to truly make parents into partners in their children's education.

The LEAs saw the SEA office as a useful and highly accessible resource for any questions they have. They reported that they value the technical assistance they have received in areas such as evaluation, but the less experienced LEA wanted more assistance in staff development, curriculum, and testing. The LEAs did not perceive the SEA office as ineffective in any way.

VI. Priorities, Trends, and Needs

Recent trends. The LEP population has continued to increase over the past six years as more Hispanic, Asian, and other immigrants make Connecticut their home. The SEA office, on the other hand, actually has fewer staff resources than it did three years ago when there was another full-time consultant working in addition to the director. The only recent addition in SEA capacity has been the allocation of a part-time (40%) evaluator.

The SEA is undertaking an ambitious statewide evaluation reporting system which will provide information for state policy decision making. The SEA has also proposed certification requirements for teachers in bilingual and ESL classes.

Within the SEA, the education of Hispanic and LEP students is high on the agenda. The bilingual director is frequently consulted by decision makers on a wide range of policy issues. Recently an ambitious list of proposals has been developed by the new state commissioner which, if implemented, will affect all students in Connecticut schools. The bilingual director was consulted and approved the recommendations which she saw benefiting LEP students. Recommendations include items such as full-day kindergarten and state proficiency testing in elementary school.

What the SEA should do more and less of. There were several suggestions for increased activities for the SEA. LEA personnel at one site wanted increased technical assistance. This LEA did not have experienced staff and its needs for assistance were probably greater than average. At the time of our visit, the state bilingual director was in the process of increasing the visibility and participation of this district with the Title VII network and other resources.

The SEA office itself wanted to increase its services in several ways. First, due to the lack of a certification requirement, bilingual teachers were released in some districts due to cuts in personnel, leaving bilingual classrooms with unqualified personnel. The SEA bilingual director felt that she needs to do more lobbying with districts so that this does not happen. Ultimately, the SEA wants certification requirements for bilingual teachers. Second, although the state law prohibits the segregation of bilingual program students, SEA staff know that many programs by design or by oversight fail to integrate the bilingual program fully into the school. More time could be spent monitoring in this area. Third, the participation of parents is required by law, but there are no mandates to educate the parents to the level of meaningful decision making or to find ways for the parents to contribute in a meaningful way. Consequently, the SEA bilingual director wants to work more with parents and to improve their participation in bilingual education.

There were no services that SEA or LEA staff felt should be reduced. One LEA stated that the SEA should be clear about the purpose and use of the data it collects. Sometimes LEA staff feel that they are providing information that will not be used by anyone, and this is something they would like to discourage.

What Title VII should cover. One of the ambiguous areas of Title VII is the monitoring of Title VII projects by the SEA director. The state bilingual director would like Title VII to be an entitlement program like Chapter 1 in which federal monies are distributed and monitored by the SEA. However, ED funds LEAs directly and the SEA has no decision making power as to which projects get funded, and ED monitors the LEA projects. The problem is that OBEMLA does not have the personnel to do the job. The SEA director would like either to have decision making power regarding LEA funding or adequate OBEMLA staff to do the monitoring of local LEAs.

Assistance from D.C. on Title VII network. Some LEAs want more technical assistance from BEMSC and other components of the Title VII network. It is the estimation of SRA staff that the services are available, but there is a greater need in less experienced LEAs. LEA staff also mentioned that the proposal process would be easier if the respective responsibilities of each contact person (e.g., budget, program) were clearly stated.

FLORIDA SEA BILINGUAL EDUCATION OFFICE

I. Background

Number of LEP students. According to the Florida Department of Education Management Information Services, there were approximately 39,995 LEP students in Florida in 1982-83. The above figure reflects the growing LEP population in Florida. In 1981, 34,967 students received bilingual education, while in 1980, 18,179 were enrolled in bilingual programs.

The U.S. 1980 census figures for Florida are divided into three categories that are of significance for non-English educational services purposes: Spanish persons 5-17 years old (174,615); American Indian/ Eskimo/Aleutian 5-17 years old (4,112); and Asian and Pacific Islander 5-17 years old (12,879). In addition, the 1980 census figures indicate that 1 out of 10 persons speaks a language other than English at home.

Title VII service centers. The Bilingual Office has a coordinating agreement with the Bilingual Education South Eastern Support (BESES) Center, also known as the BEMSC in Miami. The bilingual consultants provide input into coordination agreements and serve on the advisory board of the BEMSC.

State Bilingual Education policy. Florida has not enacted a bilingual education legislation even though every year an attempt is made to pass some form of legislation. The Department of Education does have a Bilingual Education position paper which recognizes the need to provide various educational program options to LEP students. The policy calls for the allocation of appropriate resources for educational programs designed for LEP students, an annual count of LEP students in each school, and English language mastery by LEP students.

The state supports bilingual education programs that transition a LEP student into a mainstream English classroom within three years.

Such programs provide instruction in a language that the LEP student understands and continue until the student is ready to make the transition into an all-English classroom. A Transitional Bilingual Education (TBE) program may provide oral language development in both languages and may provide reading and math instruction in the language the student understands best. Districts may also choose to implement other options to TBE, such as partial bilingual instruction or full bilingual instruction.

A bilingual/ESL endorsement is available to add on to regular teacher certification. A required 15 hours of specific courses and tests must be completed to receive either bilingual and/or ESL certification. There are eight universities in Florida that have bilingual/ESL training for teachers.

II. Resources of SEA Bilingual Office

Funding. Florida has completed the third year of a three-year Title VII grant to coordinate the provision of technical assistance to districts. Title VII funding for 1983-84 totaled $102,110. For 1982-83 and 1981-82, the respective amounts were $148,618 and $130,000.

Spending constraints. There are no major spending constraints from the state other than limited out-of-state travel.

Staffing. Two full-time educational consultants and a secretary are paid through the Title VII grant. The two consultants meet the necessary qualifications required for the positions. One has been in the present position for six years, has a Ph.D. in Education from Florida State University, and is bilingual in English and Greek. The same consultant has extensive experience in needs assessment and proposal writing and has more than 20 years of teaching experience at the university, community college, and secondary school level.

The second bilingual education consultant has been with the SEA in the current position for over four years. This consultant is completing a Ph.D. in Spanish, and can read and understand French, Italian, Latin, and Portuguese. She has more than 15 years of training and teaching experience at the university and secondary school level, and also has extensive experience in needs assessment and proposal writing.

Activities to build SEA staff capacity generally take the form of attendance at national and state conferences, district workshops, and membership in professional organizations. The two SEA consultants are active members of numerous professional organizations and are involved in publishing books, journal articles, and newsletters.

Organizational placement. The Florida State Department of Education is divided into seven main sections—four report directly to the Commissioner of Education and three are headed by individual Deputy Commissioners. The Bilingual Education Office falls under the administration of the Supervisor of Special Projects, a subsection of the Bureau of Curriculum Services. The latter bureau is one of five subdivisions of the Division of Public Schools which reports directly to a Deputy Commissioner.

III. Technical Assistance and Information Dissemination

The Coordination of Technical Assistance to Programs of Bilingual Education in the State of Florida Grant (CTAPBE) has the following six major goals:

1. Coordination of technical assistance to strengthen bilingual education projects in Florida;
2. Coordination and assistance in the development of new and proposed programs to accommodate students of limited-English-proficiency;

3. Assistance in the institutionalization process for bilingual education in district and university programs;
4. Consultative coordination and support to all levels of bilingual education;
5. Encouragement of meaningful parental involvement in schools with bilingual programs;
6. Coordination/articulation with other internal units of the Department of Education, OBEMLA, BESC, other state agencies and other states.

During 1982-83 CTAPBE served 37 bilingual programs, 18 federally-funded, and 19 locally-funded. This is a 16% increase from the previous year in which 31 programs were served, 12 of which were federally funded.

Local needs. The State Bilingual Education Office maintains an open-ended model for coordination of technical assistance. It does not have a formal mechanism for needs assessment; however, the consultants turn to the LAU Center at the University of Florida for assistance. LAU personnel visit districts to conduct needs assessments (e.g., assessment of students' language proficiency) and to determine if a district is in compliance with OCR specifications. The SEA also learns of district needs through statewide meetings and conferences such as the Education Consortium and the Curriculum Conference.

The State Bilingual Education Office has an open system of communication and maintains a Watts line so that district personnel can call the consultants at any time, free of charge, and ask for assistance. The state produces a directory which lists state, county, and district personnel, thus facilitating telephone communication.

Coordination of technical assistance versus rendering technical assistance is not distinguished by the SEA staff. For example, the administrator of Special Programs asked "Why distinguish?" One of the

bilingual education consultants stated that the Bilingual Office provides direct service to LEAs. Examples of this type of assistance may be helping LEAs write Title VII grants, providing in-service training, and providing workshops for parents co-sponsored by Florida State University (FSU). The other bilingual education consultant added that many times they act as brokers for the LEAs such as in the case where a district is looking for Vietnamese teachers. In such instances the Bilingual Office puts the districts in contact with the University of Florida or Florida State University, both of which have Title VII Ph.D. programs and which maintain files of potential applicants.

Paperwork. There are three areas of paperwork for which the State Bilingual Education Office is responsible: (a) Title VII continuation proposal, (b) Title VII annual report, and (c) the Bilingual Education Office's own evaluation. None was singled out as being excessive or burdensome.

Language testing. State education policy does not recommend tests or books to the districts. Testing latitude is given to districts. Students' language proficiency is measured through a variety of instruments such as the Crane Dominance Test and the Dade County Oral Test. Criteria for student placement in bilingual programs generally consists of language test scores, students' educational background, teacher and curriculum specialist recommendations, all with parent notification.

For grade promotion, LEP students can be tested in their native language in the third grade through the Primary Education Program (PREP). Also, if LEP children are categorized A, B, or C, LEAs may use any test they wish.

The bilingual consultants take part in the State Book Adoption process that assesses curriculum materials. They are aware of bilingual materials currently available through complimentary copies received from

publishers (e.g., Crane, Santillana) and they receive materials districts have developed.

Sources of assistance. The SEA coordinates services to LEAs in Florida that are currently being served by the Bilingual Education South Eastern Support (BESES) Center, a multifunctional support center housed at Florida International University in Miami. Among the training workshops which the BESES center conducts are project management and evaluation of educational needs of LEP students, curriculum evaluation, staff training, and teaching methodologies.

Before the BESES Center was created at Florida International University, Florida was served by the Bilingual Education Service Center (BESC) at the University of Florida in Gainesville. The BESC Center provided information, training, technical assistance as well as consultation services.

The interviewee reported that, unlike the BESC, the Bilingual Education Multifunctional Support Center (BEMSC) cannot help the State Bilingual Education Office with technical assistance other than training. As the bilingual consultants travel throughout the state, they identify training needs of school districts. These needs are then supplied to the BEMSC, and together, workshops are arranged. One of the consultants mentioned that they were spoiled last year by the services provided through the BESC.

Assistance rendering. The consultants work with all districts, Title VII and non-Title VII. The only difference is that non-Title VII programs are visited once a year whereas Title VII programs are visited twice a year.

One of the consultants chose, as a goal, to pick a district not served previously by the Office and to work closely with it throughout the year. The consultant is now on his fourth district. One of the

four districts wrote a Title VII proposal this year. The bilingual consultants encourage districts who are thinking of writing Title VII proposals to visit other districts who currently are implementing Title VII programs.

Information dissemination. The State Bilingual Education Office publishes a quarterly newsletter which is sent to all districts, OBEMLA, the National Clearinghouse for Bilingual Education, all SEAs, and individuals who request it. The newsletter contains information about upcoming conferences, resources provided by the universities and others, legislation, language assessment instruments, summer institutes, and district news. In addition, the SEA coordinates the exchange of information among bilingual education programs in the state and nationally. Other dissemination activities include letters, telephone communication, and other information networks.

IV. Other SEA Functions

Review of applications. The State Bilingual Education Office helps LEAs in writing Title VII grant proposals and reviews Title VII applications.

Monitoring. The consultants reported that last year's evaluation of Title VII programs was done internally since there was a hiring freeze. However, when the districts were monitored, reports were not sent to OBEMLA. There is no coordination between the State Office and ED in the area of monitoring. The bilingual consultants feel that ED should inform them when they come to monitor a district.

Data gathering and research activities. The State Bilingual Education Office is not involved in data gathering for federal or state purposes. No state-sponsored research in the area of bilingual education is being conducted at the present time. Research in bilingual education is generally carried out by doctoral students at various universities throughout the state.

V. Perceived Results

According to the bilingual education consultants, one of the most effective SEA activities is the coordination of activities to serve LEP children with Department of Education units, as well as with the LAU Center, the universities, the BESES Center, and the State Advisory Council on Bilingual Education. For example, SEA consultants have been included in audit review teams since 1978. Assisting districts to write proposals and disseminate information through the quarterly newsletter are two other SEA activities regarded as most effective. The consultants offered no perceptions regarding least effective SEA activities.

VI. Priorities, Trends, and Needs

Trends. Recent trends in SEA activities are characterized by the larger network developed by the Bilingual Education Office. As the bilingual consultants work with more districts, more needs are identified. In the last few years, for example, the LEP student population has become more diversified reflecting the large Indochinese migration. There is a perceived need to have more staff at the SEA level that can work with other language groups. Many districts also need assistance in proposal writing since the districts themselves do not have the resources to write competitive proposals. The state is still very slow in committing itself to adding a full-time person paid for with state money.

The bilingual consultants find future trends in SEA capacity hard to predict due to the lack of bilingual education legislation. If legislation were enacted, then guidelines for bilingual education would be formulated, the broker role would be increased, and funds would be available to strengthen further the state's role in coordination of technical assistance to bilingual education programs. Also, ESOL and bilingual educators would need to work more closely together. This would require someone at the SEA level who could coordinate both groups' concerns.

If the Bilingual Education Office staff were increased, one of the activities that would be carried out would be data gathering. One of the areas in need of documentation is the number of LEP students in the state according to language groups. Another area is the impact the state has on the education of LEP children. Data gathering would add to the goals of increasing educational excellence and decreasing the dropout rate.

The SEA would like to expand its present activities to include writing proposals to fund additional activities, i.e., teaching, presenting workshops to other SEA units, coordinating classes in Spanish and other languages on demand, and organizing activities to increase parental involvement.

The SEA is concerned that too much duplication of materials is occurring throughout Title VII projects. What is needed, the consultant suggested, is a process through the National Clearinghouse for Bilingual Education in which all materials developed through federal funds are housed in a central area. In this manner, materials can be reproduced as the need arises.

With respect to changes in Title VII regulations, the consultants would like to see the FES-to-LEP student ratio changed from 40% FES and 60% LEP to a 50-50 percent ratio, especially in popular programs like the Greek bilingual program. For example, it was suggested that once Title VII students have been served, then the programs should be opened on a first-come, first-serve basis. Another change in Title VII regulations would involve the manner in which a proposal is selected for funding. There should be a process by which verification of need is checked as opposed to relying so heavily on how well a proposal is written.

Another recommendation made by the consultant interviewed was in the area of needs assessment. Title VII regulations could be more specific in its requirement of LEP student identification. Districts

could assess all the students and then select those needing assistance. The LEP count could be broken down according to number of children per language, although it is OBEMLA's contention that this is already being done.

The bilingual consultants would like to have their program officer and OBEMLA staff be more visible in the state of Florida. This visibility could be in the form of presentations at conferences or LEA visitations. It would have a significant impact on districts and would make the guidance that the SEA currently receives more fruitful. The consultants would like to have a better coordination of monitoring with the federal government.

The bilingual consultants report no difficulty in communicating with the staff at OBEMLA. They would like to communicate more with policy makers at the federal level and, in turn, be able to pass on pertinent bilingual education information to the LEAs. At the present time, the feeling is that policy makers communicate with selected individuals at the state level who may or may not inform the rest of concerned SEA staff.

The SEA staff mentioned that it is not uncommon to receive outdated letters from OBEMLA. About 75% of the communication received is outdated. They also mentioned the need for letters to be sent not only to the Bilingual Education Office but also to the Commissioner as a matter of courtesy.

Another area in which communication between OBEMLA and the state needs to be strengthened is in the notification process of Title VII grantees. OBEMLA needs to notify the districts and the SEA directly of their Title VII award and provide a copy of the final negotiated proposals submitted to OBEMLA. Currently, the SEA relies on districts calling and informing the SEA of their grants. Also recommended is that OBEMLA send a letter of commendation to districts who score 110 on their proposal and that letter be sent to the state officer as well.

KANSAS SEA BILINGUAL EDUCATION AGENCY

I. Background

Number of LEP students. Kansas has just over 400,000 students in grades K-12, and the SEA bilingual specialist estimates that in 1984, 10,000 of these are language-minority students. Of these, about 5,000 are LEP (the current proposal states that 4,327 children were served in 1982-83).

A language survey is required of all districts on September 15 of every year, but it is difficult to obtain a precise figure of LEP students for several reasons. First, there is only a general state definition of LEP and of how LEP status should be assessed. The state specialist mentioned that local assessment procedures vary, which may contribute to inconsistency. Secondly, Kansas is located in the migrant stream, and the numbers of students change throughout the year. Between two-thirds and three-fourths of the students are listed as Spanish-speaking, and according to a 1980 survey the next largest group is Vietnamese (exact percentages cannot be calculated because of internal inconsistencies in the data). This proportion may be changing since in 1984 the Wichita bilingual director reported having a majority of Asian students. The total number of LEP students has been increasing by about 20% a year.

State legislation. In 1979, the Kansas legislature enacted a permissive bilingual education bill which provided state funds to assist in the education of language-minority children Few standards and procedures are mandated by the law, which specifically stated that rules and regulations can be adopted by the State Board. The State Board, however, has chosen to allow maximum flexibility to the local districts. The law allocates $150 per year for each student that is identified by a district as LEP, to be used in a bilingual program. Although "bilingual program" is defined, there are no specific program criteria. According

to the state law, it is permissible for a teacher, certified in an area other than bilingual, to serve as a bilingual instructor. The law also refers to an advisory committee which has statewide responsibilities, but the composition and organization of the board is not specified.

Title VII grants in state. At present, the only Title VII program in Kansas is in the city of Wichita. The program receives $65,000 in Title VII funds and is in its third and final year of funding.

Title VII service centers. The BEMSC closest to Kansas is BUENO at the University of Colorado in Boulder. The center has been the region's service center for eight years. Previously, the center in Arlington Heights, Illinois served this state.

II. Resources of SEA Bilingual Office

Funding. The total grant to the state from Title VII is $4,174, all of which is being used on training. The state bilingual specialist administers funds from three sources: (a) state bilingual education funds ($570,000), (b) Migrant Education-Chapter 1 funds ($2 million), and (c) transition program for refugees ($244,000) for a total of over $2.8 million, most of which goes directly to the LEAs. In the case of state bilingual funds, all of the funds are distributed to LEAs based on student counts.

Spending constraints. There are no spending constraints; however, the fact that one individual is responsible for all state coordination of three diverse and complicated programs such as bilingual education, migrant education, and refugee transition greatly limits what can be done in each area. While the amount of federal bilingual funding for Kansas is small, even this amount is due to end after the current fiscal year since the only Title VII program in the state is in its third and final year of funding.

Staffing. The state bilingual specialist has held the position for four years. His previous experience was in migrant education as a teacher, state consultant, and state coordinator, a position he continues to hold. He has a B.S. and an M.S. degree in education, but he does not have any formal training in bilingual education. He has become knowledgeable through college courses and by attending numerous workshops in ESL, bilingual education, migrant education, and Chapter 1.

The state bilingual specialist works in the Office of State and Federal Programs along with five other program specialists and three support staff. This office is one of four reporting to the Assistant Commissioner for Educational Services. These four offices comprise one of three divisions of the State Department of Education.

III. Technical Assistance and Information Dissemination

Local needs. SEA personnel stated that the most important needs are in the areas of basic information on language-minority children, ESL, staff training, testing, materials, and program guidelines. Both the SEA bilingual office and the Wichita bilingual/ESL program, which is the largest and best-known in the state, receive requests for this type of assistance.

The SEA bilingual specialist is also concerned with three other areas. First, there is a need to integrate programs for LEP children into the regular school curriculum and to get bilingual and regular teachers to work cooperatively. Second, there is a continuing need for staff training since staff may be bilingual but are not trained as bilingual education teachers. Third, respondents expressed a need to reduce the dropout rate of language-minority students.

The Executive Committee of Kansas Association for Bilingual Education (KABE) meets to determine needs of local districts. Although the state specialist serves as KABE president, the SEA does not have a

separate formal procedure for assessing needs. One need identified by KABE is in-service for administrators.

Sources of assistance. Both the SEA bilingual specialist and the LEA director have received assistance from BUENO, the BEMSC in Boulder, Colorado. The SEA specialist was pleased that BUENO conducted a formal and extensive needs assessment. The LEA director relies on BUENO to answer questions on legislation, to provide names of trainers and resources, and to evaluate materials. In addition, BUENO holds meetings of Title VII directors in the region to provide assistance in preparing the required reports, evaluations, and proposals. BUENO acts as an intermediary between the sites and OBEMLA. Finally, BUENO is a source of staff training.

The state bilingual specialist was aware of other sources of assistance such as the EDAC in Dallas, the BEMSC in Arlington Heights, Illinois, and IDRA in Texas, but he did not feel that they were very helpful to his region. He said they were too far removed geographically and were of more help in their own immediate locality. The LEA bilingual director, on the other hand, was satisfied with the technical assistance she had received from the NCBE, the Lau Center in Milwaukee, Wichita State University, and the Regional Office of Education in Kansas City which had provided materials for refugees.

How the SEA provides assistance. The SEA does not provide much direct assistance on bilingual program matters. At one time, the state specialist talked about regional training meetings, but these did not occur. The state bilingual specialist's principal role is to administer the funds. He provides LEAs with instructions in memo form on how to identify LEP students and forms to report the LEP count. If the LEAs request assistance in this task, he can help them locate language proficiency tests or refer them to experienced sites. The state bilingual specialist generally does not initiate contact with LEAs and does not make site visits.

How the SEA coordinates assistance. According to SEA personnel, the annual KABE conference is a primary vehicle for coordinating assistance. The state bilingual specialist uses the Title VII funds to pay for the conference; the BUENO BEMSC also pays for a portion of the conference. A task force, in which the state bilingual specialist participates, is responsible for organizing the conference. The conference is open to all districts, whether or not they are members of KABE. This year's conference was attended by about 80 people. Workshop topics included the development of a state plan for bilingual education, cross-cultural counseling, bilingual special education, refugee adjustment to American life, and language experience for LEP students.

The state bilingual specialist also coordinates assistance by referring inexperienced LEAs to established programs. For example, if an LEA requests help, he may provide the travel funds for a teacher to visit classes at another site. As a result of this method, the Wichita program has become a source of technical assistance to numerous other districts. The Wichita director is frequently consulted by telephone by smaller districts and she often sends information by mail on request. The program has begun to charge for copies of some materials.

Dissemination of information. The SEA bilingual office primarily disseminates information related to the disbursement of state funds and language count information. KABE publishes a newsletter three times a year with program information but is circulated only to KABE members.

IV. Other SEA Functions

Monitoring. Because all of the state bilingual funds go to the LEAs, SEA activities are limited. The state specialist would like to monitor and evaluate existing programs, and help schools develop new programs, but he lacks the resources for these activities.

Data gathering. Nevertheless, a certain amount of data is collected by the SEA. The LEP count was discussed in an earlier section. In addition, districts fill out a Program Evaluation Report which is summarized by the state bilingual specialist. This report provides the SEA with information; however, the data need to be collected in a standard and uniform manner to be truly useful. This would involve a different type of organization and greater resources.

Review of Title VII applications. The state bilingual specialist had the opportunity to review the Wichita Title VII proposal, but he was not instrumental in the decision to apply for federal funds. He has encouraged other districts to apply, but there are presently no new project prospects.

V. Perceived Results

The SEA specialist and the LEA director agree that the most effective SEA activity is providing funds, although everyone involved realizes that the level of funding is minimal. The LEA director is also appreciative of the transition funds, because there is an overlap of students and both sources of funding can contribute to a more complete program.

The state bilingual specialist felt the lack of program development and assessment activities made the bilingual effort less effective. He said it was impossible to coordinate those activities with the current level of funding. For the LEA director, the main problems were the absence of real communication between those providing bilingual services, including the SEA, and the absence of a statewide framework or plan for bilingual education.

No evaluation of the SEA activities has been conducted.

VI. Priorities, Trends, and Needs

Trends. SEA activities have changed primarily in the increase in services for greater numbers of LEP students. Since the bilingual legislation in 1979, there has been a steady increase in the number of LEP students reported. The most recent change is in the composition of these students, from Hispanic to Asian.

In other ways, the state's involvement in bilingual education has been static. The LEA director has been willing to work on a state plan for quite some time and has communicated this interest to the state bilingual specialist. The state bilingual specialist also sees the need for a state plan with guidelines, but stated that it is difficult to develop a plan without additional resources. The SEA has a new commissioner and, as new priorities are reviewed, it may be possible to make some changes in this area.

Needs. There are areas of agreement between the SEA and the LEA director about what the SEA should do more of. They both want the SEA to develop and promote a state plan that would include clear statements on key issues and provide clear guidelines. In addition, the LEA director wants the SEA to promote communication among LEAs. She also wants the SEA staff to stay on top of relevant actions taken by the legislature, such as the allocation of state funds, and to be an advocate with the legislature. Neither the SEA specialist nor the LEA director feels that there are other things that the SEA should be doing.

The LEA director said that as a result of recent changes in OBEMLA she did not know who her program officer was. She also found it difficult to attend meetings in Washington without extensive advance notice.

The SEA specialist wants more funding and assistance from OBEMLA. He feels that SEAs should receive a minimum amount from Title VII

(perhaps $25,000) rather than a percentage. With additional funds, the development of a state plan and a significant delivery of services would be possible. The state bilingual specialist said that he felt Basic Grants were a better use of Title VII funds than the network support centers.

LOUISIANA SEA BILINGUAL EDUCATION OFFICE

I. Background

Number of LEP students. The SEA has no data on the total number of LEP students enrolled in the state. In 1981 a plan was developed by the SEA bilingual office to obtain counts of LEP students from the state's LEAs, but that plan was disapproved by the state's superintendent of education on the grounds that it required excessive paperwork by LEAs.

According to data from the 1978 Elementary and Secondary School Civil Rights Survey conducted by the U.S. Department of Education, at the time of the survey there were 8,387 persons, aged 5 through 17, in Louisiana who had a primary language other than English.

Number and amount of state grants. In the 1983-84 school year, there are nine Title VII grants to LEAs in Louisiana (eight Basic Grants and one Demonstration Grant) for a total of $1,290,462 in Title VII LEA grant funds. There are no Title VII grants to Louisiana institutions of higher education (IHEs).

Service centers. The BEMSC serving Louisiana is based at the University of Texas at El Paso. Services in Louisiana are provided by the BEMSC satellite office in New Orleans, which is operated under a subcontract to G and A, Ltd.

State legislation. The state has no legislation requiring that special services be provided to LEP students.

The state actively encourages French as a second language for elementary and secondary students. To this end, the state's recently revised constitution encourages the preservation of native languages and cultures represented in the state. Also, in 1975 the state government enacted the Second Languages Act, which authorizes school systems to

provide instruction in second languages. To assist that goal, the state provides financial support for 300 teachers of second languages. Most of these teachers provide instruction in French but there are also a few teachers of Spanish, Italian, and Hungarian. Because there are few LEP students in the state for whom French is the home language, this state support for French as a second language constitutes a rather limited type of state bilingual education assistance.

II. Resources of SEA Bilingual Office

Funding for operations. The state's Title VII SEA grant for the 1983-84 school year is $58,253. For the 1982-83 school year it was $86,002; for the 1981-82 school year it was $182,702.

In addition to its Title VII grant, the SEA also receives limited federal reimbursement for its coordination of ESL services to refugees under the Refugee Assistance Act. Current SEA funding for this purpose is $2,340; last year the SEA received $4,940 to carry out these responsibilities.

The state does not receive any other federal funding for services to LEP students (e.g., it has no grant for desegregation of national origin minority students under Title IV of the Civil Rights Act).

Louisiana uses state funds for some SEA operations related to Title VII. Although no precise estimate of state expenditures was available, the SEA at our request developed a very rough estimate of $32,000 in state funds used for administrative and technical assistance purposes related to ESL and bilingual education. This amount includes 10% to 25% of the time and local travel expenses for each of four SEA professionals.

Spending constraints. A hiring freeze is currently in effect for all SEA employees, including federally-supported positions.

Staffing. The SEA's Title VII grant supports one professional and her secretary. The Bilingual Supervisor is an expert in foreign-language instruction and has a master's degree in French. She was formerly a teacher, has teacher-training experience at the university level, and has worked in the SEA's language-related program for four years. Working with the Bilingual Supervisor are four other professionals whose positions are state funded (see above). Two of the four are responsible for oversight of specific bilingual and ESL projects in varying regions of the state. The other two professionals are the Bilingual Supervisor's supervisors. The four state-funded professionals also spend time on other language-related projects besides bilingual and ESL programs.

The SEA develops the capacity of its staff by sponsoring staff participation in national workshops and conferences, such as NABE and TESOL.

Organizational placement. The Title VII SEA grant is administered under the Assistant Superintendent for Academic Programs. The grant is directly under the Bureau of Academic Support, which has jurisdiction over all language-related programs of the SEA.

III. Technical Assistance and Information Dissemination

Local needs. Through the BEMSC, the SEA has identified local needs related to Title VII operations. The first five needs on their list are for the following:

- Periodic meetings of project directors and coordinators for management training activities with special emphasis on project components;
- Technical assistance workshops and seminars concerning Title VII regulations and legislation and familiarization with services provided by Title VII assistance providers;

- Consultation for preparation of Title VII new and continuation proposals;
- Assistance in establishing teacher training programs with IHEs; and
- On-site project visits for program review.

In our interviews SEA respondents said that in Louisiana the greatest general need related to Title VII was to increase the recognition of school boards and LEA administrators regarding the needs of LEP students.

In interviews with local Title VII directors, we were told that their chief needs were for help in interpreting Title VII requirements for their own situations and for in-service training of instructional personnel, administrators, and school board members.

Needs for which Title VII grant may coordinate assistance. The following six areas were noted as activities for which the SEA may coordinate assistance, using Title VII funds:

1. Budget and funding strategies for the time when federal grant phases out—The SEA works in an ongoing fashion with Title VII projects in preparing Title VII continuation proposals and with non-Title VII districts wishing to apply for Title VII funds. Its primary role in these consultations is in explaining Title VII requirements and priorities, in order (a) to obtain maximum federal funding for each applicant, and (b) to encourage the development of high-quality programs. As part of this work, the SEA says that it discusses with each LEA the approaches the LEA will use to take over support for its bilingual program when Title VII funding phases out. SEA respondents reported that this is frequently a concern of LEA administrators who are considering applying for Title VII funds.

2. Project management—The BEMSC satellite office serving Louisiana meets every other month with Title VII project directors in the state and with SEA personnel to discuss topics related to project administration. These topics were selected at the beginning of the school year (shortly after award of the BEMSC contract) by the Title VII directors and the SEA. Particular need was expressed for technical assistance in project evaluation and langauge assessment. The year's agenda for technical assistance meetings for project administrators was built around these and other needs expressed by Title VII directors.

3. Instructional quality—In addition to the technical assistance provided to project directors, the BEMSC satellite office also provides technical assistance to Title VII instructional personnel. Under the BEMSC contract, each Title VII project in the state is to be provided at least one technical assistance workshop during the school year. Because some of the Title VII LEAs are located near one another, several LEAs have been able to send their Title VII instructional personnel (or some of them) to BEMSC workshops in neighboring LEAs. The topics addressed in the workshops were determined through a needs assessment process similar to that described for project administrators. According to SEA respondents, workshops for instructional personnel have been held on such topics as computer-assisted instruction, strategies for parental involvement, ESL instruction, and oral language assessment.

4. Assessment and use of curriculum materials—Because of the SEA's interest in French-language instruction, substantial attention is given to the development and dissemination of curriculum for French-language learning. The SEA is currently developing curriculum guidelines for elementary and secondary ESL. In addition, SEA respondents expressed satisfaction in having obtained state approval for a number of ESL texts

and materials (five pages in the state-approved list).[1] The SEA also assisted in printing and disseminating a multicultural teacher guide for using the arts to improve basic skills instruction.

5. Selection and use of instruments to measure language proficiency—In Louisiana, LEAs may select their own tests and set their own entry and exit levels for the delivery of special services to LEP students. With OBEMLA approval, most LEAs in the state use the SEA-developed Home Language Survey for identification of LEP students. The Language Assessment Survey is typically used for student language assessment in French, Spanish, and English. Approaches to language assessment are discussed in many of the BEMSC workshops, which the SEA participates in arranging.

6. Improvement in data gathering—The SEA does not conduct activities to address this need directly, although the BEMSC has provided assistance to specific LEAs in this area.

Other needs. The following additional activities were reported by the SEA personnel interviewed:

1. Strategies for obtaining federal funds—In addition to the activities mentioned above, the SEA also assists LEAs by providing them with all information pertinent to application deadlines and processing procedures.

2. Paperwork for Title VII or state funding—The SEA provides extensive assistance to LEAs in preparing Title VII grant applications, including direct on-site assistance as well as the assistance described above.

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[1]In Louisiana, LEAs must select textbooks from a state-approved list, except that federally-assisted projects in LEAs may select any texts or materials that are appropriate whether they are on the list or not.

3. Student achievement testing or needs assessment—The SEA coordinates relatively little technical assistance on achievement testing, except to the extent that LEAs ask for achievement tests written in languages other than English. Its assistance in needs assessment is provided mainly to applicants who are requesting assistance for new Title VII projects.

4. Personnel recruitment and screening—The SEA is very active in recruiting and screening teachers for its Second Language program. Through the Council for the Development of French in Louisiana (CODOFIL) and the Cordel Hull Institute, teachers are recruited from France, Belgium, Quebec, and Mexico to serve as "Foreign Associate Teachers" of French and Spanish in Louisiana schools. CODOFIL and the Cordel Hull Institute are responsible for recruiting, screening, and placing these teachers. The teachers are not, strictly speaking, bilingual education teachers, except for the very small numbers of Louisiana students for whom French is their home language. According to SEA respondents, the SEA also maintains an active file on teachers seeking employment in bilingual education.

5. In-service training—The SEA coordinates assistance in this area by working with the BEMSC satellite office in assessing local needs and designing training services for teachers in Title VII projects.

Sources of assistance. As already indicated, the SEA has an active and seemingly productive relationship with the BEMSC satellite office. (The satellite office consists of one individual, who identifies and schedules outside onsultants as needed for specific services and who also provides extensive services himself.) The SEA has very little

contact with the BEMSC headquarters in El Paso,[2] although the Bilingual Supervisor and Director of Academic Support are members of the BEMSC advisory council.

The SEA also uses the Title IV National Origin Desegregation Assistance Center in San Antonio, Texas, known as Intercultural Development Research Association (IDRA). The SEA has asked IDRA to conduct workshops and conferences on various topics around the state. According to SEA respondents, IDRA has been highly responsive to the state's needs and, like the BEMSC satellite office, has provided high quality services. Apparently, the BEMSC satellite office and IDRA maintain regular communication with each other.

The SEA appeared to have used the services of the EDACs much less than it has used these other two service providers, although the Supervisor and Director are members of the advisory council for the Dallas EDAC. The SEA currently has relatively little contact with the state's IHEs.

The SEA makes use of the services of the American Indian Resource Center in Oklahoma, in instances in which it has certain needs related to American Indian and migrant students.

How the SEA provides assistance. The SEA provides assistance mainly through regular telephone contact with LEAs and through visits. The LEAs with whom the SEA maintains contact are all current Title VII

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[2]The SEA respondents said they had a better relationship with the BEMSC than with the BESC, in part, because the BEMSC satellite office works closely with the state and keeps the SEA fully informed of all BEMSC activities within the state. Apparently, the BESC had not kept up as high a level of communication with the SEA. However, when the BESC closed, it turned its resource library over to the SEA, where it is currently maintained.

grantees, previous Title VII grantees (who have taken over the Title VII-supported services with local funds), and potential new Title VII applicants. The SEA visits the bilingual and/or ESL projects of approximately 15 LEAs a year (almost one-quarter of Louisiana's total 66 LEAs). About 20 LEAs send representatives to one or more of the conferences or workshops that the SEA sponsors (generally in collaboration with the BEMSC or IDRA).

How the SEA coordinates assistance. The SEA coordinates assistance through its regular contact with the Louisiana LEAs, the BEMSC satellite office, and IDRA. Through this contact, the SEA discusses local needs for assistance and identifies services that would be useful to particular LEAs. It then stays in contact to determine that services are actually delivered, often attending local workshops provided for LEA personnel.

Dissemination of information. The SEA has no newsletter. It mainly communicates via telephone and sends memos on particularly important information (e.g., application due dates).

IV. Other SEA Functions

Activities that Title VII authorizes SEAs to coordinate. The following comments were provided concerning the activities that Title VII authorizes the SEA to coordinate:

1. Evaluation—The SEA does not provide direction to LEAs on how to evaluate local bilingual projects. It does, however, provide technical assistance on evaluation methods.

2. Information exchange—As indicated previously, the SEA bilingual office is actively involved in information exchange among districts—mainly through its telephone and meeting contacts with LEAs and its arrangements for workshops. SEA respondents gave examples of visits

they had arranged for LEA personnel to observe bilingual programs in other districts. The regular BEMSC workshops for Title VII directors also provide a useful forum for information exchange.

3. Assessment of personnel training needs—The SEA fosters such review through the needs assessment activities it sponsors in collaboration with the BEMSC satellite office.

Monitoring. The SEA conducts two visits a year to each Title VII LEA to observe the Title VII program and to offer appropriate assistance. A program review instrument is used by the SEA monitor in conducting these visits. From our interviews, it seemed that the visits are probably conducted in an informal fashion with an emphasis on helping the LEA improve its program, rather than on regulatory compliance. Visits are timed to coincide with meetings of Title VII parent councils. Each visit concludes with an exit interview with the LEA superintendent and later a follow-up letter and report. A copy of the letter and report is forwarded to OBEMLA. A second visit later in the school year then offers further opportunity for follow-up on problems or needs identified in the earlier visit.

The SEA respondents indicated that they are sometimes able to raise a problem or bring a need to the attention of the superintendent or school board—in instances in which the local bilingual director may not have enough organizational clout to be as effective as the SEA visitor.

The SEA's authority to monitor Title VII projects has been strengthened somewhat by the "certification" of the State Board of Elementary and Secondary Education stating that the SEA has authority for "general supervision" of bilingual education programs. We were told that this statement legitimates and assists the SEA in monitoring LEA performance.

Data gathering. The SEA does not have any activities in this area. Several years ago the SEA bilingual office sent needs assessment questionnaires to each LEA asking them to check off needs that they were experiencing in serving their LEP students. The purpose of this needs assessment process was to identify areas in which the SEA bilingual office should provide (or stimulate the provision of) services to LEAs. For the past two years the SEA has not been able to send out the form because senior SEA personnel saw it as excessive paperwork for LEAs. Thus, the SEA's role in assessing statewide needs has been curtailed because of an effort to reduce data-gathering activities.

Research. The SEA does not have any activities in this area. However, it does coordinate research activities by agencies desiring to study local bilingual and ESL services.

Review of Title VII applications. The SEA bilingual office reviews all Title VII applications from Louisiana LEAs prior to submission to OBEMLA. At the conclusion of the review process, SEA personnel prepare a letter to each LEA applicant describing the strengths and weaknesses of its application. A copy of each letter is also forwarded to OBEMLA.

Dissemination of information on bilingual education certification requirements. Louisiana has both bilingual and ESL certification standards. Each SEA respondent with whom we spoke on this topic referred to the standards as "on the books." Because there is no requirement that certified bilingual or ESL teachers be used in teaching LEP students, the certification standards do not particularly affect the types of instruction actually delivered or the qualifications of the teachers who provide the instruction. Nevertheless, the SEA does disseminate the standards to LEAs enrolling LEP students.

V. Perceived Results

Most and least effective SEA activities. The Bilingual Supervisor stated that the SEA's most effective activity was the coordination of technical assistance to LEAs. She said that the goal of all their assistance activities was to improve services to LEP students and to raise the quality of local programs. She expressed the belief that the assistance efforts coordinated by the SEA have been effective in raising project quality and, ultimately, in improving services to students.

She said that their least effective activity has been public relations within the SEA and that the bilingual office needed to become better known within the SEA and around the state, to build awareness of the needs of LEP students and the accomplishments of the Title VII program. (LEA respondents reiterated that view.)

She also said that the SEA had not been particularly effective in stimulating the interest of Louisiana's IHEs in bilingual education.

Evaluative information. The SEA bilingual office has an evaluation checklist that is distributed to all local Title VII directors asking for their assessment of the office's overall performance. It also has a form on which workshop participants are asked to indicate their satisfaction with the workshops in which they particiate. We did not see any completed forms, nor did we see tabulations of the evaluation checklists; the completed questionnaires and survey forms are kept on file in the SEA offices.

VI. Priorities, Trends, and Needs

Trends. The Bilingual Supervisor said that she hopes that ESL courses may some day be substituted for required high school English courses. This would be an important change from the current arrangement, in which ESL courses are treated as high school elective courses

for purposes of meeting high school graduation requirements. The Bilingual Supervisor said that this change would be an important step because it would signify state recognition of the importance of special services to LEP students.

Priorities. The Bilingual Supervisor said she doesn't expect major changes in SEA capacity in bilingual education and ESL. She does, however, anticipate that the SEA may assume the support of her position and that of her secretary, thus freeing up much of the SEA's Title VII money. She would like to see those Title VII funds used (a) to support research (on topics such as language interference) and state surveys (possibly conducted by a Louisiana nonprofit organization), (b) to bring in nationally known consultants to talk about their work, and (c) to link up with BETNET, the computerized information system operated by the National Clearinghouse for Bilingual Education.

She recommended that the BEMSC be converted back to a grant rather than a contract. She said that Louisiana's successful relationship with the BEMSC was largely the result of the capabilities and dedication of the director of the BEMSC satellite office. According to her, the greater flexibility of grants made them better suited than contracts to the provision of technical assistance in bilingual education. (For example, because of the limit on BEMSC workshops, the SEA has not been able to schedule any workshops for LEAs that are considering whether to apply for Title VII funds.)

Needs. The Bilingual Supervisor said that she believed that change in local needs will be a direct reflection of the growth in the number of LEP children and adults in Louisiana.

SEA respondents said that the state should provide more support for services to LEP students through (a) a state mandate that LEP students be served by educational programs that will improve their English proficiency, and (b) state funding for the hiring of ESL and bilingual education teachers.

Guidance or assistance from OBEMLA. The following comments wre made regarding guidance or assistance from OBEMLA:

1. OBEMLA should not require that SEAs submit an annual application, beyond assurances of compliance with Title VII requirements and a brief listing of major activities to be carried out under the grant.

2. OBEMLA should disseminate to all SEAs:

(a) Brief descriptions (with funding levels) of all Title VII Basic and Demonstration grants, so that SEAs can put their projects in touch with similar projects elsewhere; and
(b) Descriptions of findings of all Part C studies.

3. OBEMLA should improve its processes for review of LEA grants so that SEA comments are considered an important part of the application process.

NEW YORK SEA BILINGUAL EDUCATION BUREAU

I. Background

Number of LEP students. Based on the LEP definition used for New York's special state aid for LEP students, there are 100,400 LEP students enrolled in New York's public schools in grades K-12. Students are included in this count if (a) by virtue of foreign birth or ancestry, the student speaks a language other than English, and (b) the student scores below the 23rd percentile on a test of English proficiency or its equivalent; or (c) the school district receives special state approval.

LEAs count the number of LEP students served in approved programs in each school in the spring of each year and report those figures to the SEA. These counts then determine the amount of state LEP aid that is allocated to the LEA for the following school year.

Number and amount of Title VII grants. Excluding the two Title VII grants being implemented by the SEA, there are currently 141 Title VII grants being operated in the state. These are summarized in Table 6.

Service centers. The Bilingual Education Multifunctional Support Center (BEMSC) serving New York is based at Hunter College, with Columbia Teachers College as the subcontractor.

Prior to this year, two Bilingual Education Service Centers (BESCs) served New York. New York City was served by the BESC based at Hunter College, with C. W. Post University as the subcontractor. The rest of New York state was served by the BESC based at Georgetown University.

Table 6

Title VII Grants in New York
FY 1983

Type of Grant	Number	Amount
LEA:		
Basic	93	15,618,268
Demonstration	7	1,219,360
Vocational training*	6	1,234,344
Materials development	2	338,167
Desegregation	3	397,618
	111	18,807,757
Higher education:		
Teacher training	19	1,886,162
Doctoral fellowship	8	656,607
Vocational instructor training*	1	136,787
School of education	1	11,658
	29	2,691,214
Parent training:	1	29,779
State total (excluding SEA grants):	141	$21,528,750

*Authorized under the bilingual vocational instruction provisions of the Vocational Education Act.

State legislation. New York has state legislation and regulations requiring local school systems to provide bilingual education to LEP students under certain circumstances and also has two state-funded programs of assistance to LEAs that comply with the state educational service requirements for LEP students.

Section 3204 of the New York State Education Law, as amended by Chapter 827 of the Laws of 1982, requires LEAs receiving LEP aid to provide a program of bilingual education on ESL in accordance with standards established by the Commissioner. Participating LEAs must measure each LEP student's proficiency in English to determine the student's further participation in the program.

Part 154 of the Regulations of the Commissioner establishes standards for bilingual education and ESL programs. In school buildings with 20 or more LEP students of the same native languge at the same grade level, a program of bilingual education must be provided. In school buildings with less than 20 LEP students at the same grade level, a program of ESL must be provided. Districts are required to submit comprehensive plans to the department that (a) specify the instructional services to be provided; (b) provide for the coordination of local, state, and federal funds; (c) provide evidence that instruction is provided by personnel holding the appropriate certification; and (d) provide any other information required by the Commissioner relative to the planning, administration, funding, or evaluation of the program.

Part 80.9 and 80.10 of the Regulations of the Commissioner of Education establish standards for bilingual education and English as a second language teachers.

LEP aid is provided to school districts with programs approved under Part 154 of the Regulations of the Commissioner of Education. During the 1983-84 school year 177 school districts received $4,930,086, based on a weighted aid formula. In April, 1984, the state legislature enacted legislation doubling the weighted aid formula. It is projected that as a result school districts within the state will receive $10,585,782 in school year 1984-85.

State bilingual categorical aid, amounting to $1,905,732, was received by 173 school districts and four technical assistance and training centers for programs serving LEP students in school year 1983-84.

State special legislative projects were provided for school districts and nonprofit organizations conducting programs for LEP students, programs for immigrant students, and innovative second language programs for LEP and non-LEP students. These projects typically receive funds totaling $500,000-800,000.

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II. Resources of SEA Bilingual Office

Total amount for operations of bilingual office. Based on information provided by the Bureau of Bilingual Education, we estimate that the Bureau's total operating budget for the 1983-84 school year is approximately $1.541 million. This amount reflects funds from the sources listed in Table 7.

Table 7

Funding for the Bureau of Bilingual Education

Source	Amount
Title VII SEA grant	861,314
Title VII SEA training grant	111,744
Title IV Civil Rights Act SEA grant	236,497
New York Office of Vocational Rehabilitation funds	115,142
State general funds*	100,000 approx.
ECIA Chapter 1 migrant funds	116,187
Total:	$1,424,697

*This amount pays for the salaries of the Bureau Chief and one secretary, with associated fringe benefits.

New York's Title VII SEA grant for school year 1982-83 was $975,039; for school year 1981-82, the Title VII SEA grant was $823,323.

Spending constraints. Since April, 1983, a hiring freeze has been in effect throughout the SEA. The freeze prohibits any hiring to fill positions left vacant by resignation or transfer. It applies to positions funded under federal grants as well as state-funded positions.

Although there is no current freeze on staff travel, the state regularly requires its staff to use land-based travel for distances of 150 miles or less. Because New York City is less than 150 miles from Albany, SEA staff must travel by bus, train, or car between Albany and New York City.

Staffing. The Bureau of Bilingual Education is composed of 21 professional staff members and 10 support staff, all of whom are full-time employees. Among the staff members, two are Ph.D.'s, and eight are doctoral candidates. All professional employees have master's degrees. All Bureau employees are fluent in English, 14 are fluent in Spanish, and two are fluent in French. For each of the following languages, there is at least one employee who is fluent: Cantonese, Greek, Italian, Haitian-Creole, and Mohawk. All 21 professional employees are certified teachers with teaching experience in LEAs. Several also have experience in the provision of teacher training.

Because of the size of the Bureau staff, its internal organization is important to a consideration of Bureau operations. The staff offices report directly to the Bureau Chief, the Bureau is divided into four regional offices, with headquarters in Albany, western New York, Long Island, and New York City. (The Albany regional office is located in the same location as the main Bureau offices.) Bureau staff are based in each of these offices, with the regional supervisors communicating regularly with the Bureau Chief. The geographic divisions among the four regional offices reflect the demographic distribution of LEP students across the state. The Albany, western New York, and Long Island regions each include 5,000 to 6,000 LEP students, and the New York City region enrolls 80,000 LEP students.

The Bureau has used its Title VII SEA training grant to improve the staff's familiarity with current trends, practices, and research in bilingual education and related areas. Under the grant, the Bureau held a one-week training session in August of 1983 in which staff workshops were conducted by bilingual education experts from fields including law, civil rights, and educational practice. This session was attended also by personnel from other SEA offices that are involved with bilingual education, including research, evaluation, and data collection. The Bureau has also held training/information exchange sessions with bilingual directors from nearby states. Sessions are currently planned

that will focus on issues affecting students from Haiti, China, Central America, and New York's Native-American reservations.

Staff development is also encouraged by sponsorship of staff members to attend national and state conferences on bilingual education.

A final important aspect of the SEA's staffing for bilingual education is the Commissioner's Advisory Council on Bilingual Education. It is appointed by the Commissioner, and four times a year it meets with him to discuss statewide issues relevant to the education of LEP students. The expenses of this 25-member group ($7,000 in the current year) are paid by the Title VII SEA grant. The Bureau Chief credits this group with helping to keep bilingual education issues at the forefront of state-level decision making in education.

Organizational placement. Within the SEA, the Bureau of Bilingual Education is part of the Division of Language Skills, which also includes foreign language education and English and reading education. This division is placed under the supervision of the Assistant Commissioner, Office of General Education. That office reports to the Deputy Commissioner, Office of Elementary, Secondary, and Continuing Education, who in turn reports to the Executive Deputy Commissioner and Commissioner of Education.

III. Technical Assistance and Information Dissemination to Districts

Local needs. In our interviews five local needs were consistently noted in the area of bilingual education. These were: (a) language skills assessment, (b) program evaluation, (c) materials development, (d) education services for LEP students who are handicapped, and (e) teacher training. These and other needs are discussed below in the context of needs which the Title VII SEA grant may address.

Needs for which Title VII grant may coordinate assistance. In each of the following activities, the New York SEA plays a major role:

1. Budget and funding strategies for the time when federal grant phases out—The Bureau conducts several activities that are intended to address LEA needs in this area. First, it keeps LEAs apprised through memoranda and other mailings of all federal and state grant application procedures, deadlines, and other requirements. To support this activity, the SEA maintains current mailing lists of all LEAs enrolling LEP students and of community organizations interested in the education of LEP students. Second, it provides information and assistance to private foundations interested in bilingual education and other services to LEP students (e.g., the foundation recently established by the Coca Cola Company to assist Hispanic education).

2. Project management—The Bureau conducts one to two statewide Title VII management conferences annually. These conferences typically include sessions on resource management, program evaluation, and other topics relevant to local Title VII services. Regional service center personnel from the BESCs, now the BEMSCs, attend these sessions and describe opportunities available from other organizations.

3. Instructional quality—When requests come in regarding instructional improvement, the requests are routed to appropriate language area specialists in the Bureau (e.g., Spanish, Asian languages, Haitian-Creole, etc.). As appropriate, requests are also referred to service centers that have particular areas of expertise.

4. Assessment and use of curriculum materials—Language area specialists and service centers are also used to address these needs.

5. Selection and use of instruments to measure language proficiency—The Bureau coordinates services provided by testing experts from the state's Division of Educational Testing who assist on technical

matters related to student testing. This unit has, for example, developed Regents' Competency Tests in mathematics and writing in 26 languages. Despite the SEA's in-house expertise, Bureau personnel said that local districts experience continuing needs for high-quality language assessment instruments in all languages.

6. Improvement in data gathering—In the New York SEA, data collection from LEAs is carried out by the SEA's research and evaluation offices. When LEAs express needs in this area (e.g., in generating counts of LEP students), they are referred to the personnel in the appropriate state office.

Other needs. The following were identified as other expressed needs in which the SEA plays an active role:

1. Strategies for obtaining federal funds—As already noted, the Bureau keeps LEAs apprised of application requirements and deadlines through regular mailings.

2. Paperwork for Title VII or state funding—As noted previously, the Bureau holds periodic management conferences at which assistance in developing applications is provided.

3. Student achievement testing, needs assessment, program evaluation—As noted earlier, the Bureau often refers requests in these areas to appropriate state offices. Bureau personnel then follow up, as needed, to determine that adequate help has been provided. The Bureau also loans testing materials to LEAs for their review. These materials are acquired by the Bureau using their Title IV Civil Rights Act grant and then reviewed by Bureau personnel and personnel from the SEA testing office.

4. Personnel recruitment and screening—The Bureau does little in this area, except to pass along information about job openings and job candidates. It performs no formal clearinghouse functions in this area.

5. In-service training--The Bureau provides in-service training workshops, particularly in the use of SEA-developed curricula materials. Certain requests for assistance in this area to BEMSCs or other assistance providers.

Other sources of assistance for LEA programs. The chief source of assistance is the BEMSC serving New York. Several respondents said, however, that the BEMSC has not been as useful a resource as the BESC because it has not been able to respond to local needs in as flexible a manner as was possible under the BESC structure due to contractual changes. In addition, the BEMSC contractor, Hunter College, has not worked with bilingual projects outside New York City before this year.

The SEA uses the National Origin Desegregation Assistance Center at Columbia Teachers College from time to time.

Another source of assistance are the four state-funded technical assistance centers on bilingual education that are operated at various locations in the state.

How the SEA provides assistance. Using the assistance capacity created by the Bureau's large staff and the state's financial commitment to bilingual education, the SEA is able to provide a considerable amount of assistance directly to LEAs, without referring assistance requests to intermediate assistance providers. This help is provided through a mix of outreach and response techniques, including visits to LEAs, conferences, newsletters, and telephone calls. According to information provided by the Bureau, Bureau staff participated in 162 site visits to LEAs during the 1983-84 program year. In addition, seven parent conferences were held in locations around the state during this period, and seven LEA technical assistance conferences were held.

How the SEA coordinates assistance with BEMSCs. In the past many of the conferences held by the Bureau involved personnel from the

various bilingual-related service centers. Apparently, there has been somewhat less involvement by the BEMSC than by its predecessor, the BESC, as described earlier.

Dissemination. The SEA disseminates a newsletter three times a year to all LEAs in the state enrolling LEP students. The newsletter reports on state-level events relevant to bilingual education (e.g., implementation of new certification requirements for bilingual education, development of Regents' Competency Tests for speakers of languages other than English) and national issues (e.g., proposed amendments to Title VII). The newsletter also typically describes one or two local bilingual education projects in the state and describes "success stories" of LEP students who have derived significant benefits from their participation in bilingual education programs.

The SEA encourages the exchange of information between districts through regional and statewide conferences and through the involvement of the BOCES.

IV. Other SEA Functions

Activities that Title VII authorizes SEAs to coordinate. In each of the following areas, SEAs are authorized to coordinate the activity, as contrasted with coordinating assistance in the activity:

1. Evaluation—The Bureau is currently developing an evaluation guide that will authorize the collection and reporting of local evaluation data that can be aggregated at the state level.

2. Information exchange—The SEA takes an active role in encouraging information exchange among LEAs, as described earlier, through conferences, workshops, newsletters, and other mailings.

3. Assessment of personnel training needs—The New York SEA refers most persons with needs in this area to a service center or to their BOCES. However, when the state launches a new academic initiative relevant to LEP students, such as the state's new ESL curriculum, the Bureau sponsors training workshops around the state.

Monitoring. In the past year, the Bureau conducted 58 program review visits and participated in 39 high school registration visits. The program review visits were conducted chiefly for the purpose of monitoring LEAs' compliance with Chapter 827 and CR Part 154. In addition, site visitors examined programmatic aspects of bilingual services and offered suggestions for technical assistance or other improvements as necessary. For districts with Title VII grants, site visitors also reviewed LEAs' implementation of their Title VII programs. Bureau staff said that they typically review each Title VII project in its first year of operation and visit projects periodically thereafter.

In New York, the SEA reviews each high school in the state every five years to assess compliance with state educational and administrative standards. For high schools with significant LEP enrollments, the high school registration office in the SEA arranges for a Bureau staff member to participate in the team visits to assess Chapter 827 and CR Part 154 compliance and for other purposes. In New York City, a Bureau staff member participates in all high school registration visits.

For both types of monitoring visits, Bureau staff report that they typically end the visit with an exit interview with the LEA superintendent. They then send a letter to the LEA reiterating the main conclusions of the monitoring visit and offering appropriate forms of technical assistance. Following the letter, Bureau staff generally call the LEA to determine whether there are questions about the Bureau's conclusions and suggestions. In some instances a follow-up visit is conducted later in the year.

Data gathering. The New York SEA collects data from all districts regarding the enrollment of LEP students and of students who are members of national origin minority groups. Data are also collected on the services available to LEP students. This data collection activity is part of the Basic Education Data System, and it is implemented by the SEA's Bureau of Educational Data Systems. The Bureau of Bilingual Education uses these data but has no direct responsibility for collecting them.

Research. The SEA is currently starting up a large in-house study of the implementation of services to LEP students statewide. To address this question, a large sample of LEAs will be visited to determine how their services to LEP students are being implemented and whether local efforts have been effective in improving the English proficiency and academic achievement of the LEP students. The SEA's research office is directing this study, with assistance provided by the Bureau of Bilingual Education.

Review of Title VII applications prior to submission to ED. The Bureau has an elaborate system for reviewing and commenting on Title VII applications. The system includes (a) notification to LEAs of deadlines for submission of applications to the SEA and then to OBEMLA, (b) workshops to assist LEAs in preparing their applications, (c) systematic screening and review of applications in Albany, (d) communication of suggestions to applicants on strengthening their applications, and (e) receipt of the revised applications at the same time that they are forwarded to OBEMLA. Last year the Bureau received 100 applications for review from LEAs and institutions of higher education.

Dissemination of information on bilingual certification requirements. New York recently implemented certification requirements in bilingual education and in ESL. In its annual conference for Title VII-funded institutions of higher education, Bureau personnel discussed the implementation of these requirements, including the new procedures

for assessment of the language proficiency of teacher candidates. In addition, the Bureau also sent out several mailings on the new certification requirements to all LEAs enrolling LEP students. Bureau staff members routinely respond to questions concerning bilingual education and ESL certification.

V. Perceived Results

Most and least effective activities. The Bureau Chief said that the most important accomplishment of the Buremu has been its success in achieving what she termed institutionalized changes on behalf of LEP students. Among these changes she included the statewide service mandate for LEP students, the funding formula that aids LEAs enrolling LEP students, and the certification requirements. It was reported that the Bureau has played a useful role in achieving these statewide improvements.

The Bureau has been least effective in its Title VII monitoring, according to the interviewee. The Bureau Chief attributes this to the lack of authority given to SEAs under Title VII. Because the SEA has no mechanism to require LEAs to implement changes in their Title VII programs, it cannot require LEAs to improve their programs or even to implement their programs in accordance with their applications.

Evaluative information available on activities. The Bureau does not conduct evaluations of its own activities.

VI. Priorities, Trends, and Needs

Recent trends. Recent trends are described below under (1) SEA activities, (2) SEA capacity, (3) technical assistance resources, and (4) local needs.

1. SEA activities—The Bureau of Bilingual Education is becoming increasingly active in integrating its initiatives with other offices of the SEA and in participating in activities of other parts of the SEA. The Bureau Chief sees this coordination as a way of making the needs of LEP students better understood by the larger education system. Over the long run, she believes that this technique will help make services to LEP students a higher priority within the educational system as a whole.

At present, for example, the Bureau is working with the Office of Education of Children with Handicapping Conditions to improve procedures for the identification and assessment of handicapping conditions among LEP students. This is believed to be important because of the dual problems of (a) inaccurately labeling LEP students as handicapped when their only problem is lack of English proficiency, and (b) failing to identify actual handicaps among LEP children because of inability to communicate with the child.

The Bureau (and the Executive Deputy Commissioner of Education) has put a high priority on improving the evaluation of bilingual programs in the state. Plans and activities to achieve this have involved the SEA's evaluation office extensively.

In the most ambitious of these coordinated endeavors, New York's proposed "action plan" to improve elementary and secondary education in the state would link bilingual education and foreign language instruction more closely than before. Under certain circumstances, LEP students and English-monolingual students would work together towards dual-language proficiency. This new goal is described in New York as a focus on "second-language learning" for all students.

2. SEA capacity—SEA capacity in bilingual education appears to have remained relatively stable in recent years.

3. Technical assistance resources other than the SEA—In the view of Bureau personnel interviewed, these resources have declined with the change from BESC grants to BEMSC contracts.

4. Local needs—Not surprisingly, respondents varied in their perceptions of trends in local needs. For example, the Executive Deputy Commissioner stressed the needs of LEP students living in isolated, rural districts. Other respondents stressed (a) parent education and involvement; (b) services to LEP students who are handicapped, especially the training of teachers to work with such students; and (c) access to high quality curriculum materials, especially at the secondary level.

Bureau respondents said that they should do more monitoring and provide more direct technical assistance to Title VII projects.

Bureau personnel believe the Title VII SEA grant should permit the SEA to exercise greater supervisory authority over Title VII LEA grantees. Several mechanisms were suggested for achieving this, including (a) authority for the SEA to disapprove Title VII applications, and (b) SEA funding authority over a portion of the state's Title VII LEA funds. Such authority would permit the SEA to exercise greater leverage to achieve local program improvement.

Title VII-related guidance or assistance that would be helpful. Bureau personnel report that they work cooperatively with OBEMLA and enjoy very good relations with that office. However, they receive no feedback from OBEMLA regarding their annual application or their overall performance.

VIRGINIA SEA BILINGUAL EDUCATION OFFICE

I. Background

Number of LEP students. Virginia SEA personnel estimate that there are 8,370 LEP students in the state enrolled in grades K-12. An estimated 65% of this total is enrolled in grades K-7, and 33% is enrolled in grades 8-12. Vietnamese is the language spoken by the largest percentage (23.1%) of the state's LEP students, followed by Spanish (21%), Korean, Cambodian, and Laotion. Overall, LEP students constitute less than 1% of Virginia's total student enrollment in grades K-12.

Data on the enrollment of LEP students are based on statewide surveys that were conducted in 1981 and 1982. Although the 1981 and 1982 surveys were special data-collection efforts, the SEA regularly monitors high school enrollments of LEP students by reviewing annual reports of enrollments in ESL courses in grades 9-12, which are reported to the SEA along with all other high school course enrollments. No analogous procedures exist, however, for the reporting of K-8 course enrollments. Based on recent trends in high school enrollments, the Associate Director for Languages expressed her hunch that the state's total LEP enrollment may have declined slightly since the 1982 survey was conducted.

Title VII grants in the state. At present there are four Title VII grants operating in the state, other than the grant to the SEA:

Arlington County Public Schools	$ 92,095	Basic grant
George Mason University	135,919	Training grant
	31,548	Dean's grant
	95,392	Fellowship program

Total Title VII grant funds in Virginia, excluding the SEA grant, are $354,954.

Title VII Service Centers. The Title VII-funded Bilingual Education Multifunctional Support Center (BEMSC) serving Virginia is located at Georgetown University. Georgetown also operated the earlier Bilingual Education Service Center (BESC) that served Virginia.

State legislation. Virginia has no state laws regarding educational services to LEP students. Its current administrative policy is described in a memorandum sent by the Commonwealth's Superintendent of Public Instruction to all school systems on February 6, 1981. It states:

> It is important...for all local school divisions [districts] to respond to the needs of LEP students even though the number of students may be small. These students should be identified, and a program designed to provide instruction for them. Evidence must be available to show that these students are progressing as they should. A variety of programs in Virginia serve the needs of LEP students...ESL and bilingual education are among the approaches that you might consider, depending on your local circumstances.

II. Resources of SEA Bilingual Office

Funding. The Virginia SEA does not identify funds available specifically for state activities on behalf of LEP students. At our request, however, the Associate Director prepared a rough estimate of the SEA's total funding for these state activities. Her estimate is approximately $17,000 for state activities for school year 1983-84. With a Title VII grant of $4,725, the SEA is thus allocating $12,300 in state funds to the operations of the office, excluding personnel salaries. The state provides no earmarked funding to LEAs for services to LEP students.

The SEA's Title VII grant for the 1982-83 school year was $23,596; in the 1981-82 school year, the Title VII grant to the state was $9,400.

According to the Associate Director, the state receives a small grant under Title IV of the Civil Rights Act for the support of one specialist in the area of desegregation of national origin minority students. The work of that specialist is not coordinated with the activities of the Office of Foreign Languages, ESL, and Bilingual Education.

Spending constraints. At present there are no constraints affecting the operations of the office. Although a hiring freeze is in effect, the freeze does not affect the office because it is already staffed at full capacity, according to the respondent.

Staffing. The office is staffed by the three persons interviewed and a secretary. The Associate Director estimates that they spend approximately 10% of their time on matters related to LEP students. Thus, the state has 0.3 FTE employee concerned with LEP students (as derived by multiplying three professional employees times 10% time for each).

All three professional employees have academic backgrounds in foreign language instruction. All three also have long tenures in the SEA (e.g., the Associate Director for Languages has been in the SEA for 23 years and the Supervisors of Foreign Languages for 14 years each). Each maintains up-to-date teaching certificates in foreign language instruction.

To build staff capacity, the SEA has provided summer leave to staff members for relevant coursework. For example, one Supervisor of Foreign Languages recently took summer courses in second language acquisition and in computer-assisted instruction.

The Office of Foreign Languages, ESL, and Bilingual Education is organizationally placed under the Assistant Superintendent for Instruction.

III. Technical Assistance and Information Dissemination to Districts

Local needs. According to the persons interviewed, the most important local needs are related to (a) the diversity of languages spoken by LEP students in the state's LEAs, and (b) the dispersed location of many of the state's LEP students, with many LEAs enrolling small numbers of LEP students. Because of these factors most of the districts that enroll LEP students are unable to create full classes of LEP students who speak the same home language. For this reason, all the state's LEAs enrolling LEP students, except Arlington, rely on ESL services rather than bilingual education. Our SEA respondents stated that no LEAs in the state except Arlington were eligible to apply for Title VII funds because they lacked the necessary concentration of same-language LEP students. (Although not noted by SEA staff, Fairfax County also has sufficient concentrations of LEP students for bilingual classes but has chosen an ESL approach to their instruction.)

The lack of local Title VII projects in the state means that the Virginia SEA implements very few of the Title VII activities that it is authorized to carry out. For the past several years, its main Title VII activity has been an annual conference on bilingual education and ESL attended by LEA and nonpublic school representatives, university and Title VII service center personnel, and parents; this conference is described in subsequent sections of this report. The SEA has also supported the development of certain materials identified as being needed by LEAs in the state. For example, in 1983, it commissioned the development and publication of A Guide for Educators of Vietnamese LEP Students (Harold Chu, George Mason University). This publication appears to be of high quality and has reportedly been widely used throughout the state.

In addition, the SEA is active in helping LEAs identify sources of help and information related to bilingual education and ESL instruction. These services are provided in an ongoing, informal fashion, mainly

through regular telephone contacts with LEA personnel responsible for services to LEP students.

The SEA is able to identify local needs for services to LEP students through regular contact with LEA personnel and through the process for developing the agenda of the annual bilingual/ESL conference. Several months before each year's conference, the SEA convenes a planning committee whose task is to identify areas in which technical assistance sessions are needed. The committee is made up of LEA and nonpublic school personnel from around the state who work with LEP students and university personnel involved in ESL and bilingual teacher training programs. For the March, 1984 conference, the following topics were identified by this group as important:

- special education needs of LEP students;
- teacher training for services to LEP students who are handicapped;
- ESL teaching techniques for use with adults;
- assessment of ESL materials;
- entry and exit procedures for ESL students; and
- use of microcomputers in ESL and bilingual education.

Workshop sessions on each of these topics were then planned for the conference and subsequently carried out.

Needs for which the SEA may coordinate assistance. The Virginia SEA's work in areas such as budget strategies, project management, instructional quality, curriculum, and language proficiency testing is limited due to (a) there being only one Title VII district in the state, and (b) the fact that the SEA bilingual staff members do not consider themselves to be bilingual education experts. (All three are experts in foreign language instruction.) The Title VII director in Arlington, said that she doesn't rely on the SEA staff for assistance on any matters related to the delivery of bilingual education services because

she is so close to other sources of assistance (including the Georgetown BEMSC, George Mason University, and the National Clearinghouse for Bilingual Education). She said that the SEA had nevertheless been helpful and interested in the Arlington program and had, for example, set up opportunities for personnel from other Virginia LEAs to visit Arlington and observe their instructional programs for LEP students.

From its contact with non-Title VII districts the SEA reports local needs for improved measurement of student language skills, both for placement and assessment purposes. This need is felt primarily in languages other than Spanish. When LEAs contact the SEA to express needs in this area, the SEA generally puts them in touch with either Arlington County or Fairfax County LEAs or the Georgetown BEMSC.

Other needs. The Virginia SEA's activities related to federal funding are minimal because there are no LEAs in the state with sufficient concentrations of LEP students to apply for Title VII funds, except Arlington and Fairfax Counties.

The annual conference provides opportunities for LEAs to learn about new approaches for in-service training of ESL staff. These new approaches come from other LEAs and from universities (especially George Mason University) that are involved in ESL and bilingual services.

Sources of assistance. SEA personnel said that the Georgetown BESC had been the main source to which they had directed LEAs in need of technical assistance. However, they have not been able to make the same use of the BEMSC (even though it is staffed with the same persons). They said that, from their perspective, the transition from BESC grants to BEMSC contracts had created much more "red tape" and had curtailed the service center's ability to respond to local needs in a flexible manner.

SEA staff said they rarely used services available from the Leslie College EDAC. They said that other sources, such as Georgetown and NCBE, were used instead.

How the SEA provides assistance. The Virginia SEA provides assistance primarily through its annual bilingual education/ESL conference and through its publications. For the 1984 conference, 25 school systems, 13 institutions of higher education, and 5 private institutions/agencies sent representatives to the two-day series of workshops and meetings. A total of 240 persons participated in the conference.

The SEA conducts very few site visits to assist or review bilingual/ESL projects. Although they intend to visit five or six LEAs per year, they had not visited any during the 1983-84 school year up to the time of our February visit. They have not visited the Arlington County project in five or six years. In their travels throughout the state in connection with foreign-language instruction, however, they sometimes spend part of their visitation time discussing LEP-related problems and programs with administrators. On several occasions the SEA has also provided financial assistance to Arlington County for the development of curriculum-related materials.

How the SEA coordinates assistance. The Virginia SEA personnel stated their belief that the annual conference has been effective in building an active network among LEAs, universities, and service centers. Through this network, LEAs learn who can provide various types of help. The Arlington Title VII Program Director confirmed to us that the conference has been effective in this way.

The Title VII Director also reported that the Virginia SEA had facilitated her efforts to obtain technical assistance by paying her registration fees to national conferences, such as those of the National Association for Bilingual Education and the national association for Teachers of English as a Second Language.

Dissemination of information. The SEA does not send out a newsletter on bilingual education/ESL. It sends a memo to all school systems each year extending invitations to the annual bilingual/ESL conference.

IV. Other SEA Functions

Activities that Title VII authorizes SEAs to coordinate. The following four activities were mentioned by the SEA personnel interviewed:

1. Evaluation—SEA personnel noted this as an area of local need. However, it is not being explicitly addressed by the SEA.

2. Information exchange—this area is addressed through the annual conference, publications, and regular contact with LEA personnel.

3. Selection and use of instruments to measure language proficiency—this area is not addressed directly by SEA staff. LEAs having questions or problems in this area are referred to the Georgetown BEMSC and to Arlington and Fairfax County LEAs.

4. Assessment of personnel training needs—this area is not addressed directly by SEA staff. LEAs having questions or problems in this area are referred to the Georgetown BEMSC.

Monitoring. The SEA does not conduct any monitoring related to Title VII grants to LEAs or institutions of higher education.

Data gathering. The SEA's activities in this area are described on the first page of this case study report.

Review of Title VII applications. The SEA sees its review of Arlington's Title VII applications as an opportunity to facilitate Title

VII funding for Arlington. The Title VII Program Director confirmed that view.

Dissemination of bilingual teacher certification requirements. Virginia has ESL certification requirements but no requirements for bilingual certification. The ESL requirements have been in place since 1982 and have been widely disseminated in the state.

V. Perceived Results

Most and least effective activities. SEA personnel judge their most effective activity to be the annual conference. They also expressed the belief that their SEA-sponsored publications had been very effective. They judge their small resource library on bilingual education/ESL to be their least effective service. However, because virtually no resources go into the operation or maintenance of the library, there has been no need to eliminate it. (Items in the library are donated by publishers, service centers, etc.)

Evaluative information on activities. The SEA asks all participants in the annual conference to complete evaluation forms on the conference. The form asks for information on most and least effective parts of the conference and suggestions for future conferences. The completed forms are then analyzed to develop a summary evaluation, which is used by the conference planning committee in designing the next year's conference.

A review of the 1983 conference evaluation summary and 1984 conference agenda revealed that the latter did, in fact, respond to many suggestions made regarding the 1983 conference.

In addition, the SEA includes an evaluation form with all publications that it sends out. When returned, these forms are reviewed and kept on file.

VI. Priorities, Trends, and Needs

Recent trends. SEA activities under Title VII have changed relatively little in recent years. During years when the SEA Title VII grant has been larger, the SEA has used its added resources to disseminate informational materials to ESL and bilingual educators around the state. Those activities have been dropped during years when the Title VII grant was small. The SEA does not foresee any changes in its activities for the next several years.

As seen in the long tenures of the SEA bilingual/ESL staff, there has been no major change in SEA capacity in a number of years, except that obtained as the current SEA staff become more skilled and knowledgeable in bilingual/ESL services. The SEA staff anticipate no major change in their overall capacity in the immediate future.

With the change from BESCs to BEMSCs, SEA personnel perceive a significant reduction in the technical assistance resources available in the state. This change is believed to result from the loss of flexibility that existed under the BESC grant structure. SEA personnel expressed their regret regarding this change and said it would impede LEAs' ability to address unexpected difficulty in their provision of bilingual/ESL services.

Needs. The SEA sees the largest new local needs as those imposed by the influx of illiterate immigrants into the state's LEAs. The needs of these students are different from and generally greater than those of foreign students who arrive in U.S. schools with reading and writing abilities in their home languages. Although most of these students entering the state enroll in Northern Virginia's LEAs, a few enroll in other Virginia LEAs.

The only activity that the respondents thought the SEA should do more of was to improve the SEA's ability to link LEAs with assistance

providers such as the BEMSC. The factor impeding the SEA's current ability to do this is the contractual limitations on the BEMSC's ability to respond to LEA and SEA requests.

Title VII-related guidance or assistance that would be helpful. The SEA Associate Director for Languages expressed an interest in receiving earlier notice of OBEMLA-sponsored meetings for SEA personnel.

WASHINGTON SEA BILINGUAL EDUCATION OFFICE

I. Background

Number of LEP students. According to SEA personnel the total number of LEP students presently stands at 12,000. This number is rising steadily.

The number of LEP students is derived from monthly counts that LEAs are required to submit to the SEA. However, the state's method of funding LEAs that provide services to LEPs is a significant factor influencing LEP counts. Between 1979, when the state bilingual education legislation was enacted, and 1981 LEAs were reimbursed on a per-LEP basis. In 1981, the state opted for block grants, thereby reducing the incentive for LEAs to identify and keep accurate counts of LEP students. It was estimated by SEA bilingual staff that as many as 4,000 LEP students may not have been identified due to this loss of incentive.

Per-pupil expenditures for participants in bilingual education programs were targeted at $400 prior to initiation of the block grant program. In actuality, they were usually somewhat lower than that. Under the block grant program, LEAs had the flexibility to use their funds as they saw fit. Because of an influx of refugees, some districts opted for using their grants for purposes other than for bilingual education. Currently, the state is under a court order to fund basic education programs "fully and adequately." This ruling has forced bilingual education out of the block grant program and into reinstatement as a categorical program. While no official statement has been issued as to what would constitute full and adequate funding of bilingual education programs, current legislative thinking was reported to center on the figure of $350 per pupil.

In academic year 1984-85, the state will return to the old reimbursement system, and it is anticipated that the LEP count will rise

substantially. Of significance will be the added technical assistance requirements to LEAs that this will imply.

Number and amount of state grants. In school year 1983-84 Washington's SEA Bilingual Education Office received $50,274 under the Title VII SEA Projects for Coordinating Technical Assistance Program. This figure represents approximately 4.85% of the total amount of Title VII funding received by the state through a fellowship grant to the University of Washington, a Dean's Grant to Washington State University, six Basic Title VII grants to LEAs, and one LEA Demonstration grant. In school year 1982-83 the SEA grant was $70,954, and in 1981-82 the amount totaled $75,140.

Service Centers. The SEA coordinates technical assistance with other Title VII-funded support agencies. The BEMSC that currently serves Washington is located in Portland, Oregon. A National Indian Bilingual Center located at Arizona State University also serves Washington, as well as the other 49 states and territories. Previously, two BESCs provided technical assistance to Washington--one located at the University of Washington in Seattle and the other headquartered in Tacoma.

State legislation. In 1979, Washington enacted bilingual education legislation which mandates that services be provided to all limited-English-proficient students. The type of bilingual education program that is specified is a transitional program with an ESL component. Yearly evaluations of students are required and entry and exit criteria are specified. Parental involvement is optional under Washington's bilingual education legislation.

II. Resources of the SEA Bilingual Education Office

The SEA's $50,274 Title VII grant pays for two-thirds of the salaries of the Bilingual Education Program Director and a secretary.

The Bilingual Education Program Office benefits from the expertise and services of a bilingual consultant that is funded through Title IV of the Civil Rights Act. In addition, services for LEP students are coordinated with the Equity Education Section. According to SEA personnel, resources for bilingual education that supplement state funding come from (a) the Migrant Education Section; (b) Chapter 2 which allocates 5% of its funds for bilingual education; and (c) Vocational Education. No information was available regarding the amount of Chapter 1 money designated for bilingual education. While 5% of Chapter 2 money is generated by a state's LEP student count, districts are not required to spend this money on LEP services.

Spending constraints. The state imposed a hiring freeze on the SEA in 1980-81. Because of this, the State Bilingual Education Office is currently understaffed by one professional FTE. No solution to this problem is seen in the near future, and since the state is returning to reimbursement rather than block grants as a means of disbursing state bilingual education funds, it is expected that requests for technical assistance will increase. The SEA bilingual education director favors the reimbursement system because more students will be served. However, he is aware that no funds were set aside by the state for administration of the program.

Staffing. As mentioned in a previous section, the Bilingual Education Office staff consists of the director and one full-time secretary. The director, who holds an M.A. in Foreign Language Teaching, has been the SEA bilingual education director for eight years, and is bilingual in Spanish and English. He has taught Spanish, French, and Latin in this country, and ESL in Peru while on a Fulbright grant.

The office is assisted by a bilingual consultant, paid entirely through Title IV of the Civil Rights Act. The bilingual consultant has a Ph.D., speaks English and Spanish, and has a working knowledge of Pilipino and Tagalog. He is an experienced teacher and administrator.

The bilingual education office stresses staff development and encourages people to attend conferences and workshops whenever possible. The office sponsors a language and culture workshop once a year to acquaint state employees with current social issues affecting their areas of responsibility. Topics covered in these workshops have included minority learning styles, Pacific Rim Country information, Refugee Culture information, Stereotypes, and a variety of topics dealing with political issues in the third world. The office also favors global education and is hoping the legislature will pass a bill, presently under consideration, making it part of the state-adopted curriculum.

The State Bilingual Education Office is organizationally placed under the Office of Multicultural/Equity Education, which is under the Division of Instructional Programs and Services. The director is satisfied with his office's organizational placement and feels the functions of his office are articulated with other departments. He also feels he receives the administrative support he needs to function well.

III. Technical Assistance and Information Dissemination

The telephone is the most commonly used channel for dissemination of information. In the past the State Bilingual Education Office used to produce a newsletter which was well received. Its publication was discontinued, however, in compliance with a state mandate. Now the Bilingual Education Office relies on contact people for information dissemination at each of the 115 LEAs that have a state or federal bilingual education program. Communication with these individuals is usually via memo. There is currently a state-supported "general education" newspaper which has a readership of 75,000. Its utility as a vehicle for bilingual education information dissemination is limited, however, because it is too broadly focused. In sum, the methods used for dissemination of information, in aggregate, are adequate, if not ideal. Program people feel that a focused bilingual education

newsletter would help them communicate with educators and administrators not directly involved in bilingual education.

Local needs. When asked about specific needs of LEAs, the director and the bilingual consultant both cited the tremendous shortage of qualified teaching personnel. Although LEAs are said to recruit vigorously, not enough teaching personnel can be found in many of the languages spoken by recent immigrants and refugees.

The director of bilingual education for the state of Washington brought up an argument that has been voiced elsewhere as well. He noted that the present administration is strongly advocating the notion of capacity building through OBEMLA. The idea that one three-year grant should suffice, however, fails to take into consideration a number of realities such as transiency of teachers and other professional educators. It also overlooks the westward movement of refugees and immigrants who were originally placed in the East, Midwest, and South. It also ignores the crisis that arises when even one family with school-age children arrives in an LEA that has not previously encountered students of the same language group. Each of these situations, the director pointed out, is exacerbated by policy decisions at the federal level that cause disruption in services. The recent change from BESCs to BEMSCs is a case in point.

The director also voiced a need for research and the development of classroom materials in several Asian languages, particularly Hmong. He also felt that bilingual special education represented an important problem area in which almost nothing has been done to date. There is a need for trained personnel to diagnose problems, for the development of appropriate test instruments to conduct the diagnosis, and a need for trained special education teachers to teach LEP students. At present the state's legislation requires that children eligible to receive special education services be identified with a variety of tests. But there are no known tests or qualified translators in many of the

students' languages. Thus, many students are not identified and, consequently, not served. A similar problem exists in the area of bilingual education for gifted students.

In general, the director of the Bilingual Education Office noted that there was a need to provide technical assistance different from that which was provided in earlier years. While staff turnover in the LEAs perpetuates a need for workshops on basic bilingual education topics, there is an increasing but as yet unmet need to cover more sophisticated problem areas such as health, rape prevention, vocational education, and computer-assisted instruction as well. Some districts are quite experienced in providing basic bilingual education services, but their needs are now more advanced; the Bilingual Education Office needs to coordinate technical assistance in these new areas.

The SEA identified equity problems, not only across languages but among LEAs. Some LEAs have much higher per-pupil expenditures than others and utilize more resources. The more affluent districts are thus in a position to provide more sophisticated services to LEP students but lack the technical expertise to do so. This situation highlights once again the need for at least one more staff person in the Bilingual Education Office to provide additional technical assistance.

The needs mentioned above were derived from informal needs assessment conducted by the SEA via frequent contact with the field. The BEMSC presently in Portland, Oregon will be conducting a thorough formal needs assessment.

Needs for which the SEA may coordinate assistance. The SEA provides awareness workshops informing LEAs that Title VII resources are available to meet the needs of LEP students. It also provides technical assistance in proposal writing. Each year, the SEA provides two bilingual education awareness workshops, one in the eastern part of the state and one in the western part of the state. Despite these workshops, the

number of LEAs that actually request assistance in proposal writing is small. Bilingual Education Office staff presume that this situation stems from the fact that OBEMLA discourages multiple-language programs, precisely the type needed in many Washington LEAs. Those LEAs presumably feel that it would not be worth the effort to write a proposal having only a slim chance of being funded.

Evaluation. Both the director of the Bilingual Education Office and the bilingual consultant said that testing and evaluation are the areas in which they have the least expertise. Consequently they provide little technical assistance in evaluation. Although there are efforts to initiate a statewide evaluation system, it is not seen as a realistic goal for the near future.

Project management and instruction. According to SEA personnel, the Bilingual Education Office assists in areas such as instruction, management, materials development and materials selection. For example, the SEA has developed approximately 67 resource materials in many languages and under a variety of topics. The SEA responds to requests for materials from LEAs and even other SEAs. When the SEA is itself unable to provide the requested assistance, it places the requesting LEA in touch with other LEAs or support services that can provide the assistance (e.g., the NCBE and the BEMSC).

Sources of assistance. Washington SEA personnel report that cooperation among SEAs was good. California was singled out as being very helpful in concrete ways, while New York was singled out for political leadership. The Texas SEA was also mentioned as being helpful, as was the EDAC in Dallas, Texas. Louisiana's SEA as well as the Service Center in Massachusetts were also credited for assistance rendered.

The EDAC serving the Washington area was not seen as particularly helpful nor was the Indian Center located in Arizona. This latter

center, it was said, would not be able to meet the needs of the SEA because of geographical constraints as well as the vast heterogeneity of Indian populations. The needs are too many and too varied. It was pointed out that the needs of the Indians do not fit the bilingual education mold since most are fluent English speakers.

The National Clearinghouse for Bilingual Education was viewed as helpful, particularly for specialized resource "packages," e.g., bilingual vocational education. The Kansas Refugee Center was identified as useful, especially for materials on certain subjects like adult ESL or ESL for elementary education. The NODAC was also mentioned as being helpful.

Some problems with the operational procedure of the BEMSC in Portland, Oregon, were noted. Although the staff of this center is held in high regard, the services provided have been restricted because of the new contractual arrangement. Under the new system, if unforeseen needs arise, a contract modification must be negotiated before services can be provided. The kind of flexibility afforded by the previous system enabled the service centers to be more responsive. According to the people interviewed, the BEMSC's activities have been reduced in number and scope. There is hope that this will change since BEMSCs are in their first year of operation. However, there are structural and administrative matters that could restrict the role BEMSCs will play.

Locally, the SEA seeks assistance from local colleges and universities in areas such as research and evaluation. IHEs are also a good source for specialized consultants in a variety of fields and topics. Additionally, the SEA has good rapport and credibility with various local ethnic organizations. A reason mentioned for the good working relationship was the fact that the SEA has common interests with these organizations—particularly the Commission on Asian American Affairs, the Hispanic Affairs Commission, and the Commission for Indian Affairs.

How the SEA provides assistance. The SEA relies heavily on the use of the telephone for technical assistance, and LEAs and the SEA have access to a Watts line for this purpose. LEAs that have a state bilingual program are visited at least once each year while Title VII programs are visited twice. Since the state's educational system is divided into nine educational service districts (ESD), the director has an efficient communication system with contact people in all ESDs that have bilingual education programs.

The SEA also provides assistance through workshops and conferences; SEA personnel reported that such activities are well attended by LEA personnel. Workshops have been provided in testing and assessment for identification of project students; new state legal requirements, ESL teaching techniques; and exposure to the values, educational background, and learning styles of new refugees.

The SEA encourages LEAs to exchange information and often acts as "broker" between two or more LEAs. Each year (except this one) LEAs having bilingual education programs organize a leadership conference to exchange information. This year, the BEMSC will host a similar conference for LEAs.

III. Other SEA Functions

Activities that Title VII Authorizes the SEA to Coordinate

Evaluation and assessment. It was mentioned earlier that the SEA sees itself as lacking expertise in the area of evaluation and assessment. Therefore, the SEA usually directs LEAs requesting technical assistance to the BEMSC or to universities. The director mentioned that the assistance in evaluation usually provided through Title VII is not enough. Merely presenting evaluation models to LEAs without specific guidelines and direct technical assistance is insufficient. It was said that much more effort and guidance is needed from OBEMLA in this area.

Data gathering and research. The SEA conducts very limited data gathering activities; no research is presently being conducted. This is due to the limited resources of the office and not to a lack of need for these activities. Research done in recent years has included a follow-up of bilingual high school graduates. The findings of this research concluded that a disproportionate number of bilingual students were being placed in remedial courses in community colleges.

Review of Title VII applications. Another activity in which the SEA is engaged is reviewing the applications of LEAs who apply for Title VII funds. This is a routine activity despite the fact that deadlines imposed by the federal government cause some scheduling hardships at times. A recent Inspector General audit criticized the SEA for not providing OBEMLA with written evaluations of the applications that were reviewed. The state, and now OBEMLA, have conceded that the auditors were wrong in expecting states to provide such information to the federal government, however. This is not a requirement according to the regulations governing SEA Title VII grants.

V. Perceived Results

Most and least effective activities. According to the interviewees, the legislative efforts undertaken by the SEA during the 1976-79 period were its most significant contribution. Bilingual education in the state of Washington has been institutionalized because of a state mandate. This has led to bilingual education being an integral part of the state's curriculum, with a state office to oversee its operation.

Other perceived results of the SEA's abilities include a plan for coordination of technical assistance, a resource library which includes many resource materials available to LEAs free of charge, and the technical assistance provided to refugee programs.

The SEA sees itself as being least effective in providing specialized technical assistance to LEAs. At times geography works against the office's efforts since staff are unable to provide workshops for longer than one-half day to one day. The BEMSC is not seen as the solution to this problem because of the contractual constraints mentioned earlier and because of the difference in perceived need. For example, the LEAs and the SEA have identified special education as a need but the BEMSC may not have the expertise or resources to assist in this area.

Another related problem is having to be a generalist in providing technical assistance since there are many areas of need. The State Bilingual Education Office only has one full-time professional staff person although it uses a consultant from the refugee program, as mentioned earlier. Although both are quite competent, their areas of expertise do not encompass all the needs of the 115 LEAs that have state or federal bilingual education programs as well as those of LEAs with LEP students but no program. The types of technical assistance requested by this latter group can be especially diverse including hygiene, cultural matters, or simply explaining the U.S. educational system to new refugees.

IV. Priorities, Trends, and Needs

Trends. The characteristics of Washington's student population has been changing dramatically in recent years. It was pointed out that of the state's 300 LEAs, only 12 have no minorities now, as opposed to 175 in 1970. The state has 8,000 refugees enrolled in schools, an increase of 1,400 from 1981. The Asian student population has increased by 93% in the last 10 years, and the Hispanic student population is increasing at a rate of about 3% a year.

Needs. The changes in student body composition represent different needs, thereby requiring specialized administrators who can respond to

the assistance needed. The SEA has been attempting to keep pace with this change.

Priorities. Much has been done to build capacity among LEAs, but less restrictive policies are needed from OBEMLA. The SEA's impression is that OBEMLA's notion of capacity building is not well informed. Placing a three-year limit on LEA grants may not be reasonable if the LEA has undergone changes in its student body composition. Such changes are likely to require additional and prolonged assistance. Making prior grantees ineligible for Title VII grants is also unreasonable if districts demonstrate dramatic changes.

What the SEA should do more of. When asked what the SEA should do more of, the interviewee said that more data collection should be undertaken, e.g., student dropout issue. It was said that this activity could be greatly improved with the aid of new technological innovations (e.g., computers).

The dissemination of information could be improved if the SEA were to reinstate the use of a newsletter. SEA personnel stated that LEA superintendents, counselors, and other administrative or resource people should be informed about the changing needs and the resources available to them. The education newspaper presently being used for this purpose is not enough.

What the SEA should do less of. When asked what the SEA should do less of, it was said that the SEA should do less hand-holding. That is, it should focus more on real problems and providing lasting solutions. In other words, the SEA would like to provide more service to institutionalize change and to build capacity. They saw this as a way of utilizing their time more efficiently.

Guidance or assistance from OBEMLA. The SEA feels it needs more direction from OBEMLA regarding programs for Native Americans. Since

there is emphasis in bilingual education to use the student's non-English language for instructional purposes, education for the Native American is consequently perplexing to many educators. Also, for the same reason, it is felt that proportionally fewer Indian programs are funded by Title VII.

Communication with OBEMLA in general was judged to be good, and some OBEMLA staff members were seen as very helpful. However, OBEMLA as a whole was perceived as avoiding dealing head on with some problems affecting the entire field of bilingual education. For example, definitive policy decisions and guidelines were thought to be needed in the area of bilingual education evaluation. Native American bilingual education was seen as another issue requiring OBEMLA's leadership. The issue of monitoring was also thought to be vague. More responsibility, guidelines, and resources would be welcomed. It was felt that further clarification is needed, delineating areas of responsibility for BEMSC and SEAs. Finally, it was said that at times SEA's priorities and OBEMLA's priorities are not the same. This should be realized and sufficient latitude should be allowed to accommodate each other's needs.

WISCONSIN SEA BILINGUAL EDUCATION OFFICE

I. Background

Number of LEP students. According to a 1983 census undertaken by the Department of Public Instruction, Wisconsin had 6,437 limited-English-proficient students (K through 12) representing 62 language groups. The four largest language groups are the Hispanics (3,406), the Hmongs (1,010), the Laotians (807), and the Vietnamese (336).

Title VII grants in the state. The four LEAs in Wisconsin that received Title VII grants in 1982-83 were Keshena, Oneida, Sheboygan, and Madison. In 1983-84, Watertown began a three-year Title VII grant while Madison was no longer funded, having completed its third year of program participation in 1982-83. The other three sites continued their Title VII grants.

The SEA received a Title VII grant of $22,639 in 1982-83 to coordinate technical assistance to the LEAs. The 1982 grant was $29,438. The 1983 fiscal year was also in the final year of a three-year Title VII grant to train SEA staff "regarding the linguistic and cultural characteristics of LEP students in Wisconsin and to familiarize them with the types of educational programs which are most suitable to serve such students." This grant provided $35,000 for 1983-84.

Title VII service centers. In coordinating technical assistance to the LEAs, Bilingual Program personnel in the Wisconsin SEA have worked closely with the Bilingual Education Multifunctional Support Center (BEMSC) in Arlington Heights, Illinois. This is basically the same organization that served Wisconsin earlier as a Bilingual Education Service Center (BESC). The Wisconsin office also works cooperatively with the Mid-West National Origin Desegregation Assistance Center at the University of Wisconsin-Milwaukee.

State legislation. Wisconsin's bilingual education legislation was enacted in 1976. It requires that any school which has 10 or more LEP students representing a single language group in grades K through three or 20 or more in either grades four through eight or nine through twelve provide a transitional bilingual education program to those students using a state-licensed bilingual teacher. The law also requires that bilingual counselors be made available at the high school level. The bilingual education teacher licensing requirements include proficiency in both English and the target language and 24 semester credits beyond the regular Wisconsin teaching license. This coursework must include study of bilingual education theory, methods, and models as well as of the target culture.

The legislative mandate requiring the use of licensed bilingual teachers cannot always be met because qualified teachers with the appropriate language background simply do not exist—at least in the required numbers. The problem is exacerbated by the fact that IHEs in the state do not offer bilingual teacher training programs in several of the needed languages. Hmong is a particular problem. There is only one licensed Hmong teacher in the state and no Hmong teacher training programs—yet there are over a thousand LEP Hmong students enrolled in the public school system in 13 school districts spread over the entire state.

Where appropriately qualified teachers cannot be found, ESL teachers and regular teachers can be given one-year provisional licenses. These licenses cannot be renewed, however, unless the recipients complete six credits toward their certification requirement. Unfortunately there are no teacher training programs in the state that offer the necessary courses. Thus, the requirement of completing six semester credits per year towards the renewal of the temporary license has been consistently waived since 1982. Trying to establish the much-needed programs that provide the appropriate coursework for teachers is one focus of the SEA staff.

II. Resources of SEA Bilingual Office

Organizational placement. The Wisconsin Department of Public Instruction is organized into five divisions. Responsibility for bilingual education falls within the Division for Instructional Services. The Bilingual Education Program Office is part of the Special Needs Section within the Bureau for Program Development--one of the four bureaus within the Division for Instructional Services.

Staffing. The Bilingual Education Program staff consists of two persons--one professional, the State Supervisor of Bilingual Education, and one paraprofessional, a Program Assistant. These individuals collaborate with the Migrant Program Office staff (also part of the Special Needs Section) whenever joint workshops, in-service training sessions, etc. are appropriate. They also work with the Second Language Education Consultant (from the Curriculum Development Section of the Bureau for Program Development) and frequently make use of materials developed under the auspices of that individual.

The Bilingual Education Program Supervisor holds a master's degree in Education and has studied administration, bilingual education, and counseling. He had four years experience as Director of a local bilingual program prior to assuming his position with the SEA. He is bilingual in Spanish and English, and is the current president of the Wisconsin Association of Bilingual Education (WIABE).

The Second Language Education Supervisor holds a Ph.D. in Foreign Language Education and speaks German and Spanish. He has been active in foreign language education for many years as a consultant, writer, and past president of the American Council of Teachers of Foreign Languages. He represented the SEA in the passage of the bilingual education legislation and coordinated the state's Title VII program from 1976 to 1982.

The Bilingual Education Program Assistant is bilingual in English and Spanish and has worked with Title VII since 1979. She also has experience in community education, Indian education, and Chapter 1. Her role involves gathering and reporting census data, assisting in the planning of the WIABE conference, reviewing LEA reimbursement claims, sending information to districts upon request, and clerical tasks.

Support services such as word processing are available to the Bilingual Program staff but are not an integral part of the Bilingual Program Office.

Funding. The one professional position within the Bilingual Program Office is funded entirely out of state General Program Revenues. Half of the paraprofessional position is currently funded through the Title VII Technical Assistance grant and the other half through the Title VII SEA staff training grant. In the absence of such grants, that position would also be funded out of state General Program Resources.

The state also supplies General Program Resources monies for both local and out-of-state travel and for supplies, mailings, conferences, etc. The amount of funds available appears to be adequate for the staff to carry out all their current state-related responsibilities in an efficient and effective manner. They did express concern, however, that their Title VII funding was not adequate to enable them to work as much as would be desirable with districts that would qualify for and benefit from Title VII grants. There are apparently several such districts that have failed to apply simply because they are intimidated by the grant application procedure.

III. Technical Assistance and Information Dissemination

Local needs. Needs assessment in Wisconsin appears to be handled primarily in an informal manner. Although there is a statewide census

every year that defines the number of LEP students by language group, grade level placement, and district, bilingual programs can be funded by the state only where sufficient numbers of eligible students are found. A large number of telephone requests for materials, information, or in-service training come to the state Bilingual Education Program Office from LEAs that do not have bilingual education programs and are not eligible for state funding. Often these calls are triggered by the enrollment of one or more LEP students in a district that has had no previous experience with LEPs or at least with LEPs of the language group represented by the new enrollee(s). Fortunately, the SEA has a variety of materials that can be sent to such LEAs, as in-person assistance is usually not feasible. Workshops are conducted periodically which are open to staff from any LEA, but only those districts that receive state and/or federal bilingual education funding are visited regularly.

The current SEA Bilingual Program Supervisor has conducted two site visits per year to each SEA- and Title VII-funded bilingual education program in the state. For the SEA-funded programs, he has a monitoring as well as a technical assistance responsibility. According to Wisconsin's interpretation of Title VII legislation, the state has no authority to monitor Title VII programs.

The SEA Bilingual Program Supervisor receives many requests for technical assistance and responds to as many of them as he can. Frequently this assistance is provided during the course of site visits. Simple requests can sometimes be handled by telephone. Issues of concern to many LEAs often determine the focus of regional or statewide conferences and/or workshops.

In cooperation with the BEMSC, a series of seven regional one-day workshops were offered in 1983-84. The workshops are designed to meet the specific language, cultural, and content needs of a particular area. For example, one offered in Milwaukee will focus on Hispanic

concerns while the needs of Hmong students will be addressed in the northeast part of the state. Because the state has diverse groups, the structure of the workshops may differ. For example, for some tribal groups, small-group instruction is not acceptable because of tribal traditions.

WIABE meets annually; workshops are conducted in many areas. These and other workshops are often a combined effort of the SEA Bilingual Education Program staff, M-NODAC, and the BEMSC staff. At the 1983 WIABE conference, 21 different workshops were conducted on topics that included (a) Hmong/Laotian Culture and Education, (b) Bilingual Classroom Management and the Use of Paraprofessional Aides, (c) Computers and Their Use for Instruction with Bilingual/ESL Students, (d) Implementation of Programs for LEP Students with Special Educational Needs, (e) A Multicultural Approach to Creative Writing, (f) Competency-Based Testing for Limited-English-Proficient Students, and (g) Is the Principal Responsible? The Bilingual Program as an Integral Part of the Total School. Some of these workshop offerings were coordinated by the SEA and/or BEMSC and conducted by staff members of one of the University of Wisconsin campuses. LEA personnel also participated in conducting several of the workshops.

Although the main emphasis of the workshops and other technical assistance activities has been on the effective implementation of bilingual programs and instructional strategies, training and direct assistance relating to the preparation of Title VII grant applications has also been offered by the SEA Bilingual Education Program Office. One of the major goals of the Bilingual Supervisor is to convince eligible districts to apply for Title VII funds. Therefore, each year a workshop is held to discuss the application process for Title VII grants. Only one district applied for funding last year and that district was awarded a grant. This year's workshop was a cooperative effort of Wisconsin, Illinois, and Indiana (with the assistance of the Arlington Heights, IL, BEMSC). Thirty LEAs attended. Those districts

that decide to write for Title VII funds will receive assistance from the Bilingual Supervisor. In addition, he assists districts that are newly eligible for state funding to develop a service plan. Approximately one new district per year becomes eligible.

Evaluation—other than process evaluation—has received very little attention as has the selection and use of language proficiency assessment instruments. Generally, English language proficiency is simply ranked on a four point scale by "qualified personnel" (see section on annual census below).

Under the SEA Training Grant a number of publications and videotapes have been produced. For example, a four-volume series, entitled Limited English Proficiency Students in Wisconsin: Cultural Background and Educational Needs, provides accurate, up-to-date, and practical information on nine different ethnolinguistic groups. These items are made available to state personnel and districts. This year, a one-day workshop was offered to all interested school personnel on the characteristics and needs of Hmong students.

Sources of assistance. As mentioned above, the SEA Bilingual Education Program staff works closely and frequently with BEMSC personnel and with other groups within the Department of Public Instruction. The Migrant Education Program occasionally shares in the planning and implementation of workshops and in-service training but, by virtue of a $1.2 million Chapter 1 Migrant grant that includes maintaining a bilingual resource center, it provides substantial support in the acquisition and dissemination of materials.

Other agencies with which the SEA has worked cooperatively include the Hmong Assistance League, the local Hmong Mutual Assistance Association, the Wisconsin Resettlement Assistance Office, and the Midwest National Origin Desegregation Assistance Center (NODAC) in Milwaukee. The NODAC co-sponsored the WIABE conference, for example.

On occasion, staff from the University of Wisconsin-Whitewater have provided free consulting.

The Wisconsin Department of Public Instruction Equal Educational Opportunity Bureau (Title IV of the Civil Rights Act) has had an increasing role in bilingual education. The EEO Bureau actively supported the 1983 WIABE Conference by underwriting several consultants' expenses and by providing stipends and travel expenses for parents who assisted.

When help is needed, the Bilingual Education Program staff turn first to the BEMSC. Staff there are highly regarded, and there has been a long history of successful collaborations. The BEMSC has been used more often than all of the other groups combined, with very satisfactory results.

This year, for the first time, there is a contract between the SEA and the BEMSC that defines the nature and extent of the services the BEMSC will provide. This contract was an integral part of the BEMSC's request for funding. It had to be prepared long before the SEA had acquired a clear picture of local needs and thus has had to undergo major revisions. The need to make changes in the contract before needed services can be provided limits flexibility and the timelines with which the BEMSC can respond.

Dissemination of information. The SEA Bilingual Education Program staff disseminates in a reactive rather than a proactive manner. Many materials have been developed in both written and videotape formats. Materials developed by the Center for Applied Linguistics on Indochinese languages and cultures are sent out in response to requests for help. The program staff are aware of what materials are relevant to what needs. They select and distribute whatever they believe will be helpful. No newsletter or listing of recent acquisitions is routinely sent out. A mailing list is used, however, to disseminate information on the WIABE conference and SEA-sponsored workshops.

Information is also disseminated during site visits and at local, regional, and statewide workshops. Perhaps the most productive dissemination forum, however, is the annual WIABE conference which is well attended by bilingual educators from all parts of the state. That conference is co-sponsored by the SEA which uses both General Program Resources and Title VII monies for the program.

IV. Other SEA Functions

Data gathering. Each year, as mandated by state legislation, the SEA Bilingual Education Program staff conducts a census of all LEP students, K through 12, in the state. Forms are sent out to every LEA on the first of February, and districts are required to respond by March 15 (although not all of them do). The districts report by school the number of LEP students enrolled broken down by: (a) grade level, (b) primary language, and (c) their level of English language proficiency as assessed "with the assistance of qualified personnel of the same linguistic background." The four levels of proficiency are as follows:

I. Does not understand or speak English.
II. Understands simple sentences in English but speaks no English except isolated words or phrases.
III. Speaks English with hesitancy and difficulty. With help can converse in English, understand at least parts of lessons and follows simple directions.
IV. Displays low achievement due to some language interference with learning. (A language other than English used in the home environment by parent or principal caretaker.)

Wisconsin does not have a statewide, state-prescribed and/or mandated language proficiency test. Therefore, testing is a local district responsibility.

The annual census provides the SEA with information relevant to the eligibility of LEAs for state funding of bilingual education programs. As mentioned earlier, any LEA with 10 or more LEP students in grades K through three or 20 or more students in grades four through eight or nine through twelve belonging to a single language group is eligible for such funding. The districts, of course, are free to provide any services they can in the absence of state funding, and ESL services are often available. The SEA provides technical assistance in the form of telephone consultation, workshops, and materials to LEAs that have LEP students in numbers too small to qualify for bilingual programs per se.

In addition to the census of LEP students, the Bilingual Education Program also has responsibility for conducting an annual census of students eligible for services under the Transitional Program for Refugee Children.

Annual plan of services and claim. Forms are distributed on or about May 1st each year to all LEAs eligible for state funding of bilingual education programs. By July 1st, these forms must be completed and returned to the SEA specifying plans for bilingual education programs to be implemented during the next school year. The data called for include the estimated numbers of LEP and non-LEP students to be served by grade level and language group, the number of licensed teachers, the number of aides, their salaries and percent of time in the program, and a listing of books and equipment to be purchased along with their costs. A narrative description of the planned program is also required.

When this information is received at the SEA it is carefully checked to verify that teachers are indeed licensed, that books and other materials are appropriate, and that the estimated budgets have been calculated correctly. The state's estimated reimbursements are then calculated for each LEA. The state normally reimburses districts for 70% of their actual costs but provides no reimbursement for services

to non-LEPs. There are also limitations on reimbursements for books, equipment, and "other" expenditures.

Near the end of the school year, the Plan of Services and Claim forms are returned to the LEAs who then must enter their "actuals" to update their earlier estimates. After the forms are returned to the SEA, the verification and computation processes are repeated. When all steps have been completed, the LEAs are informed as to the amount of reimbursement they will receive. The actual reimbursement is not made until January of the following year. This practice does not appear to cause any significant problems.

As an integral part of the report of "actuals," LEAs specify the number of students no longer in need of bilingual educational services.

The entire process described above is repeated for summer programs. There are, however, fewer summer programs than regular-school-year programs.

The information collected as just described is summarized in an annual report to legislature. The report is mandated by Wisconsin law.

Monitoring. The senior staff person in the SEA Bilingual Education Program staff visits each program in the state twice each year. For programs receiving state funds, one important aspect of these visits is monitoring which consists, basically, of determining whether the program is being implemented according to plan and discussing differences with appropriate staff persons. As Wisconsin interprets Title VII legislation, the SEA is excluded from any monitoring role in federally-funded bilingual education programs. Visits to Title VII programs are thus confined to providing advice and technical assistance as requested by the LEA.

Most site visits are completed in a single day, although visits to Milwaukee almost always require two or more. Since technical assistance is provided during the visits, it is clear that the monitoring activity is not excessively time consuming. It is accomplished systematically, using a four-page form prepared specifically for that purpose. The site visitor conducts a verbal debriefing prior to departing the site and a written debriefing is routinely prepared and sent to the site within a few days after the visit.

State Superintendent's Bilingual Education Advisory Council. The State Superintendent's Bilingual Education Advisory Council was recently reinstated after not having been convened for a number of years. This council is made up of parents; bilingual education teachers, administrators and counselors; testing and evaluation experts; the Supervisor of the SEA Bilingual Education Program, and others concerned with issues pertaining to bilingual education. It meets at regular intervals to keep the Superintendent appraised on current development in the field and to help analyze policy issues including the identification of potential problem areas, the formulation of alternative potential courses of action, and the assessment of the possible consequences of following each of them. One important area currently under consideration by the Council is whether (and if so, how) to involve LEP students in the state's competency-based testing program.

Although involvement with the Superintendent's Council does not consume a large amount of the Bilingual Program Supervisor's time, it is seen as a very important part of his job. He has also been involved in meetings of the State Advisory Councils on Indian Education, Migrant Education, and Asian Education.

V. Perceived Results

The Supervisor of the Bilingual Education Program feels that his office has done an effective job in providing technical assistance and

related services to LEAs that operate bilingual education programs. This opinion was supported by the Director of Bilingual Programs in the state's largest school district, Milwaukee. That individual spoke very highly of both the amount and quality of assistance that was provided. The strong presence of experts and programs in ESL and foreign language education in the SEA has contributed substantially to the success of the Bilingual Education Program Office.

One problem area noted by the SEA Supervisor of Bilingual Education Programs was in providing adequate assistance to districts that had LEP students enrolled, but not enough to qualify for state funding of a bilingual education program. He felt that this was the greatest area of unmet need and expressed frustration at the fact that more funds were not available to work closely with these districts. The Supervisor also felt that efforts to encourage districts to apply for Title VII funding has not met with a great deal of success. School board approval is sometimes a stumbling block.

VI. Priorities, Trends, and Needs

The Supervisor of the Bilingual Education Program felt that, with the possible exception of assistance to LEAs with too few LEPs to qualify for state-funded bilingual programs, the current priorities targeted for his efforts were generally appropriate. He did note, however, that they have received some negative criticism from Native American groups to the effect that the SEA was not meeting their needs.

There are only a few Native American LEPs in Wisconsin. The issue is that the Indian languages are dying out. Most of the younger people speak English and only a few of the elders still use their tribal languages. There is some considerable sentiment that these languages should be preserved and that programs should be established to ensure that they are a part of the cultural heritage passed on to succeeding generations. Although some efforts to accomplish this goal are in

progress, the expressed concern is that they are underfunded and inadequate. State bilingual funds cannot be used because the students are not LEP.

Another major concern relates to the fairly recent influx of large numbers of Indochinese students and the inadequate supply of qualified teachers to serve them. At present, institutions of higher education in Wisconsin offer bilingual teacher training projects only in Spanish and two Indian dialects (Oneida and Chippewa). Programs are needed in Hmong, Lao, and other Indochinese languages. The SEA has been encouraging various IHEs to apply for Title VII grants to establish such programs, but they have been reluctant to do so. With more funding, the SEA might be able to work more closely with the IHEs and assist them in such endeavors.

With regard to Title VII, several additional concerns were expressed. First, Title VII funding of the SEA was thought to be inadequate. The SEA's feeling is that a full-time professional person should be available for Title VII alone. Work needs to be done with both the LEAs and the IHEs to obtain Title VII funding. As pointed out earlier, the need is particularly acute in the area of teacher training programs. Many Indochinese students are currently not receiving legislatively mandated services because there simply are not enough appropriately trained teachers to provide those services. The IHEs are not prepared to initiate the needed programs on their own initiative and need "prodding" before they will apply for Title VII funding.

A second, closely related concern centers on the manner in which Title VII monies are distributed to SEAs. If that distribution is going to continue on a strict formula basis, then it seems wasteful to require that SEAs submit formal proposals. Proposal writing is a costly, time-consuming exercise and should not be required as long as the outcome is a foregone conclusion. If SEA allocations were determined on the basis of need or the merit of the activities to be undertaken, on the other hand, proposals would clearly be necessary.

SEA personnel expressed some concern regarding the perceived remoteness of OBEMLA. They felt that visits by OBEMLA personnel would greatly facilitate communication and mutual understanding. Although the benefits that would be achieved through such visits are hard to define, Wisconsin SEA people were convinced that they would be worth their cost.